

In the Matter Of:

UNITED STATES vs STATE OF GEORGIA

1:16-CV-03088-ELR

PATRICIA J. WOLF

October 06, 2022



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UNITED STATES vs STATE OF GEORGIA

October 06, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CIVIL ACTION NO.
1:16-CV-03088-ELR

STATE OF GEORGIA,

Defendant.

VIDEOTAPED DEPOSITION OF PATRICIA JOANN WOLF

Taken on behalf of the Plaintiff,

pursuant to Notice and agreement of counsel,

in accordance with the Federal Rules of Civil Procedure

before Maxyne Bursky, RPR, CRR, CRC

Certified Court Reporter

At 110 N. ABC Street, Milledgeville, Georgia

On October 6, 2022, between the hours of

9:21 a.m. and 6:07 p.m.

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1 APPEARANCES OF COUNSEL:

2
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20
21
22 ALSO PRESENT:

23 AUSTIN KING, Videographer
24
25

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1 ALSO PRESENT VIA ZOOM:

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1 THE VIDEOGRAPHER: Good morning. We are now
2 on the record. The time is 9:21 a.m. on Thursday,
3 October 6, 2022.

4 This begins the videotaped deposition of
5 Patricia Wolf taken in the matter of the United
6 States of America v. State of Georgia, et al. filed
7 in the United States District Court for the
8 Northern District of Georgia, Case Number which is
9 116-CV-03088-ELR.

10 The videographer today is Austin King. The
11 court reporter is Maxyne Bursky. We are both
12 representing Esquire Deposition Solutions.

13 Counsel, will you please announce your name
14 and whom you represent after which the court
15 reporter will swear in the witness.

16 MS. GARDNER: Kelly Gardner for the United
17 States.

18 MS. TAYLOE: Laura Tayloe for the United
19 States.

20 MR. NGUYEN: Hieu Nguyen on behalf of the
21 witness.

22 MS. HERNANDEZ: Danielle Hernandez on behalf
23 of the State of Georgia. And I'm also joined by my
24 colleague, Melanie Johnson.

25 (Continued on the following page.)

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PATRICIA JOANN WOLF

a witness herein, being first duly sworn,
was examined and testified as follows:

EXAMINATION

BY MS. GARDNER:

Q Good morning, Ms. Wolf.

A Good morning.

Q How are you today?

A I'm fine, thank you.

Q My name is Kelly Gardner and I represent the
United States. I am going to be taking your deposition
today. Would you please state your full name for the
record?

A Patricia Joann Wolf.

Q Ms. Wolf, have you ever been deposed before?

A No.

Q You are being represented today by Mr. Nguyen
for purposes of your deposition?

A Yes.

Q I'm sure he has explained a lot of this to
you, but today you and I are going to have a
conversation. I am going to ask the questions and your
only job is to answer them honestly and completely. Do
you understand that?

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1 A Yes.

2 Q The court reporter has sworn you in. That
3 means that everything you say here today is under oath
4 and must be truthful. Do you understand that?

5 A Yes.

6 Q The court reporter is going to write down what
7 you and I say in order to have a transcript of our
8 conversation. She can't record a nod or a shake of
9 your head so in order to make her job easier, I am
10 going to ask that you speak clearly and that you give
11 oral answers. Can we agree on that?

12 A Yes.

13 Q The other thing that you and I will need to do
14 is to try to avoid talking over each other so I am
15 going to do my best to try not to interrupt you when
16 you are answering and if you can let me finish my
17 question before you start to answer, that will make the
18 court reporter's job easier, okay?

19 A Yes.

20 Q If at any point you don't understand a
21 question that I ask, you should feel free to stop me
22 and say so and I will try to clarify the question,
23 okay?

24 A Yes.

25 Q If you need a break at any time, just let me

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1 or your attorney know and if you are in the middle of
2 answering a question, I will ask that you finish the
3 question and then we can see what we can do about a
4 break, okay?

5 A Yes.

6 Q Sometimes it may happen that you give an
7 answer as completely as you can and later on, five
8 minutes later, an hour later, later in the afternoon
9 you may remember some additional information in
10 response to an earlier question. If that happens and
11 you want to add anything, just let me know and we'll
12 give you an opportunity to do that, okay?

13 A Yes.

14 Q Is there any reason you can think of why you
15 will not be able to answer my questions completely and
16 truthfully today?

17 A No.

18 Q Do you have any questions for me before we
19 proceed?

20 A No.

21 MS. GARDNER: Before we get into questions, I
22 do just want to note for the record that counsel
23 have agreed that all objections except as to form
24 and privilege are reserved until trial.

25 Q Ms. Wolf, did you do anything to prepare for

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1 today's deposition?

2 A No.

3 Q Did you meet with counsel?

4 A I did.

5 Q When was that?

6 A It was Monday.

7 Q How long did you meet with counsel?

8 A Approximately 30 minutes.

9 Q Did you meet with anyone other than counsel in
10 preparation for this deposition?

11 A No.

12 Q Did you talk to anyone other than counsel?

13 A No.

14 Q Did you review any documents in preparation
15 for today's deposition?

16 A No.

17 Q Have you had any conversations with any other
18 GNETS directors about your deposition or their
19 depositions?

20 A No.

21 Q Have you reviewed any other deposition
22 transcripts in this matter?

23 A No.

24 MS. GARDNER: I am going to hand the court
25 reporter what I would like to have marked as

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1 Plaintiff's Exhibit 463.

2 MS. HERNANDEZ: Kelly, is there a way you can
3 either email me the exhibits or show them on the
4 screen?

5 MS. GARDNER: Danielle, I don't think we are
6 going to be able to show all of them on the screen.
7 I will check in with one of our paralegals to see
8 if they can email the documents as we go along. We
9 can do that but I will continue to move through the
10 questions so hopefully those come through quickly.

11 MS. HERNANDEZ: Okay, thank you.

12 (Plaintiff's Exhibit 463 was marked for
13 identification.)

14 (Witness reviewing document.)

15 BY MS. GARDNER:

16 Q Ms. Wolf, you have been handed what has been
17 marked as Plaintiff's Exhibit 463. Am I correct that
18 this is a subpoena to testify at a deposition in a
19 civil action?

20 A Yes.

21 Q The subpoena is directed to Pat Wolf; is that
22 correct?

23 A Yes.

24 Q That's you?

25 A Yes.

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1 Q Have you seen this document before?

2 A I'm not sure.

3 Q The top of this document has the case name,
4 United States v. Georgia, do you see that?

5 A Yes.

6 Q Do you understand that this deposition is
7 being taken in connection with litigation against the
8 State of Georgia?

9 A Yes.

10 Q Do you understand that that litigation relates
11 to the Georgia Network for Educational and Therapeutic
12 Support program?

13 A Yes.

14 Q Are you aware that that program is more
15 commonly referred to as the GNETS, GNETS program?

16 A Yes.

17 Q So if I use the term GNETS, you will
18 understand that to mean the Georgia Network for
19 Educational and Therapeutic Support program?

20 A Yes.

21 Q When did you first learn of this litigation?

22 A It's been several years ago. I don't know
23 exactly when.

24 Q How did you learn of the litigation?

25 A Initially, I believe the program manager over

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1 GNETS at the time discussed it with us.

2 Q Who was the program manager over GNETS at that
3 time?

4 A I think it was Virginia O'Connell.

5 Q Does Virginia O'Connell also go by Ginny,
6 G-I-N-N-Y?

7 A Yes.

8 Q What is your understanding of the nature of
9 this lawsuit?

10 A As I understand it, it is the feeling that
11 GNETS has segregated children from the general
12 education environment.

13 Q Do you understand anything else about the
14 lawsuit?

15 A No.

16 Q In the course of this lawsuit, did GNETS of
17 Oconee receive a subpoena from the United States
18 requesting that it provide certain documents about its
19 regional GNETS program?

20 A Yes.

21 Q Were you involved in responding to that
22 subpoena?

23 A Yes.

24 Q What role did you play?

25 A I was the one to gather the documents and send

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1 them in from our program.

2 Q So I take it that you are familiar with all of
3 the documents that were collected and produced in
4 response to that subpoena?

5 A Yes.

6 Q When did you first become acquainted with the
7 GNETS program?

8 A In 1998.

9 Q How did you become acquainted with the GNETS
10 program?

11 A I was hired as a program coordinator for the
12 GNETS of Oconee which was then Oconee Psychoeducational
13 Program.

14 Q What is the GNETS program?

15 A The GNETS program is a therapeutic program for
16 students that have emotional behavior disorders or
17 other disabilities. It is the most restrictive
18 environment on the special education spectrum, so
19 serving therapeutic and academic needs.

20 Q How is the overall network structured?

21 A There are 24 programs in the State of Georgia.
22 Each of us are regionally based in the RESA catchment
23 areas generally. Some have physical agents that are
24 RESAs, some have physical agents that are school
25 systems. Each program has a director and then staff

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1 assigned to them under a program manager at the State
2 level.

3 Q You mentioned earlier that there are 24
4 programs that are regionally based and I believe you
5 said that those regions are tied to the RESA catchment
6 areas; is that correct?

7 A As I understand it, yes.

8 Q What is a RESA catchment area?

9 A Regional Educational Service Agency so each
10 RESA has the local education authority or school
11 systems under their purview to provide support.

12 Q So there are various county or city school
13 systems that are assigned to a particular RESA
14 throughout the State?

15 A Correct.

16 Q That's generally organized in some geographic
17 region?

18 A Correct.

19 Q I may be using some acronyms today for brevity
20 so I want to run through a few of those to make sure we
21 are on the same page.

22 A Okay.

23 Q If I use the term Georgia DOE, will you
24 understand that to mean the Georgia Department of
25 Education?

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1 A I will.

2 Q If I use the term State DOE, will you
3 understand that to mean the Georgia Department of
4 Education?

5 A Yes.

6 Q If I use the term LEA, will you understand
7 that to mean Local Education Agency?

8 A Yes.

9 Q If I use the term RESA, will you understand
10 that to mean Regional Educational Service Agency?

11 A Yes.

12 Q If I use the term GNETS centers, will you
13 understand that to mean stand-alone GNETS locations?

14 A Yes.

15 Q If I use the term GNETS school-based
16 locations, will you understand that to mean GNETS
17 locations that are based in general education settings?

18 A Yes.

19 Q If I use the term PBIS, will you understand
20 that to mean Positive Behavioral Interventions and
21 Supports?

22 A Yes.

23 Q If I use the term EBD, will you understand
24 that to mean Emotional and Behavioral Disabilities?

25 A Yes.

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1 Q If I use the term general education settings,
2 will you understand that to mean public schools in
3 Georgia where children with EBD and other behavioral
4 health conditions receive instruction and services
5 alongside children who do not have disabilities?

6 A Yes.

7 MS. GARDNER: I am going to hand the court
8 reporter what I would like to have marked as
9 Plaintiff's Exhibit 464.

10 (Plaintiff's Exhibit 464 was marked for
11 identification.)

12 (Witness reviewing document.)

13 BY MS. GARDNER:

14 Q Ms. Wolf, you have been handed what has been
15 marked as Plaintiff's Exhibit 464. Do you recognize
16 this document?

17 A Yes.

18 Q What is it?

19 A It's my resume.

20 Q Is this a current version of your resume?

21 A Yes.

22 Q Are you currently the director of the GNETS of
23 Oconee program?

24 A I am, yes.

25 Q How long have you been director of the GNETS

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1 of Oconee program?

2 A Since 1999.

3 Q I believe you said earlier in 1998 you served
4 as a program coordinator for GNETS of Oconee?

5 A Yes.

6 Q Am I correct in understanding you served as
7 program coordinator for about a year before you became
8 the actual director of the program?

9 A Correct.

10 Q Do you hold any educational degrees?

11 A Yes.

12 Q What degrees are those?

13 A I have a master's in social work. I have a
14 specialist in educational leadership.

15 Q Any other degrees?

16 A A bachelor's in criminology, yes.

17 Q Where did you obtain your bachelor's in
18 criminology?

19 A Florida State University.

20 Q When was that?

21 A That was in 1990.

22 Q You said you have an educational specialist
23 degree?

24 A Yes.

25 Q Where did you obtain that degree?

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1 A That was at Georgia College and State
2 University.

3 Q What year?

4 A That was in, I have to look, it was in 2008.

5 Q You said you also have a master's in social
6 work?

7 A Yes.

8 Q Where did you receive your master's in social
9 work?

10 A At Florida State University.

11 Q What year?

12 A 1992.

13 Q Do you hold any other professional licenses
14 apart from your educational degrees?

15 A Yes, I have a license in clinical social work.

16 Q When did you first obtain your license in
17 clinical social work?

18 A That was in 1996 in the State of Georgia.

19 Q Is that licensure still current?

20 A Yes, it is.

21 Q Any other professional licenses apart from
22 your educational degrees?

23 A No.

24 Q Do you hold any other credentials that are
25 relevant to your work in GNETS that we have not

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1 discussed?

2 A Yes, the professional leadership Tier 2
3 certification with the Georgia Department of
4 Professional Standards.

5 Q What is that?

6 A Leadership in social work.

7 Q What is required to obtain that certification?

8 A You have to have a master's level degree and
9 certification in leadership and social work.

10 Q To whom do you report directly in your
11 capacity as director of the GNETS of Oconee program?

12 A Regarding fiscal and personnel issues, the
13 Oconee RESA executive director, and it is Eddie Morris.

14 Q Do you report to anyone apart from fiscal and
15 personnel issues?

16 A No, unless there is a program manager at the
17 State level that may have an issue that may be a parent
18 concern, that person I would report to to respond on
19 that.

20 Q Who is that program manager at the State level
21 that you are referencing?

22 A Vickie Cleveland.

23 Q Does anyone report to you?

24 A Yes.

25 Q How many people report to you?

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1 A I have approximately, I don't have my staffing
2 pattern in front of me, but approximately 27 staff that
3 report to me.

4 Q Is that generally all of the staff at GNETS of
5 Oconee?

6 A Yes, it is.

7 Q What are your duties as director of GNETS of
8 Oconee?

9 A The overall supervision of the program,
10 safety, budget issues, educational and therapeutic
11 issues.

12 Q I want to take a look at your resume here
13 because you also have some information about your role
14 as director of the GNETS of Oconee program. Do you see
15 the section that discusses your role as director of the
16 GNETS program?

17 A I do.

18 Q So am I correct in this first bullet point
19 that the GNETS of Oconee program serves somewhere
20 approximately between 80 and a hundred students with
21 severe emotional and behavioral challenges?

22 A That is correct.

23 Q And those students are in grades K through 12?

24 A That is correct.

25 Q If you jump down to the third bullet point it

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1 says, "maintain a positive school climate continually
2 seeking to improve academics, reduce discipline,
3 eliminate use of emergency physical restraint and
4 provide effective learning with followup coaching and
5 support to staff."

6 Do you see that?

7 A I do.

8 Q In terms of your role continually seeking to
9 improve academics, what steps do you as director take
10 to do that?

11 A I try to ensure that our teachers are, have an
12 understanding of the curriculum, the Georgia Standards
13 of Excellence and the requirements for each grade level
14 and what is to be taught; have an understanding of how
15 to use the educational programs that they may be using
16 in the classroom; trainings at RESA or at the local
17 school system, that they participate and attend those,
18 that they are fully certified; those kind of things.

19 Q When you say you try to ensure that teachers
20 have an understanding of the curriculum and the Georgia
21 Standards of Excellence, are there any particular
22 trainings that your staff receive in order to assist
23 them in doing that?

24 A There are RESA trainings that they will attend
25 but I also provide professional training and learning

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1 for them.

2 Q So you provide professional learning directly?

3 A I do and sometimes over the years I will have
4 people come in and provide, I can't think of all the
5 trainings offhand, but have people come in and provide
6 it to the staff, and also just in addition to that, the
7 programs that they use, people come in and train them
8 in that as well.

9 Q When you say the programs that they use, what
10 programs are you referring to?

11 A For instance, the iReady curriculum, and
12 associates will come in and train the staff yearly as
13 well as Moby Max, Edgenuity, all the teachers are
14 trained in how to use those programs by the people that
15 put the programs out.

16 Q We will come back to some of those programs.
17 It says here that you also reduce discipline. Do you
18 see that?

19 A Yes.

20 Q What steps do you take to try to reduce
21 discipline?

22 A We review the data on, as a leadership team on
23 a monthly basis. The teams, the satellite teams will
24 review the data on a weekly basis generally, sometimes
25 every two weeks and, you know, talk about are there

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1 procedural things that can occur that would help
2 support that student in reducing the discipline. So we
3 just look at each student individually as well as a
4 whole as the classroom.

5 Q The data you are referring to when you say you
6 review, that's data about the students' behavior?

7 A Correct.

8 Q Anything else you do in order to reduce
9 discipline?

10 A No, not that I know of.

11 Q It also says here in your capacity as director
12 you work to eliminate use of emergency physical
13 restraint?

14 A Correct.

15 Q How do you do that?

16 A Provide training in deescalation and we use a
17 program called MindSet which is how to safely
18 physically intervene should a student become
19 aggressive.

20 Q Are all of your staff trained on MindSet?

21 A Yes.

22 Q Who provides that training?

23 A We have in our program, there's five or six
24 MindSet instructors including me.

25 Q So between the five or six of you, you turnkey

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1 that training to the rest of the staff?

2 A Yes, and provide coaching and support during
3 the year.

4 Q How often is the staff trained on MindSet?

5 A At least yearly, but we do a midyear, just not
6 a full training, but a condensed training where we go
7 over the concepts of MindSet.

8 Q Moving down to the fifth bullet point from the
9 top, it says, "regularly communicate program
10 accomplishments, personnel and/or fiscal needs to the
11 Oconee RESA Board of Control (fiscal agent)."

12 Do you see that?

13 A Yes.

14 Q How do you regularly communicate program
15 accomplishments, personnel and/or fiscal needs to the
16 Oconee RESA Board of Control?

17 A On a monthly basis I provide a written
18 document that the board can review with any kind of
19 accomplishments or student numbers, things like that.

20 Q Do you create that document?

21 A Yes.

22 Q You said you prepare that document monthly?

23 A Yes.

24 Q Moving down to the second bullet point from
25 the bottom, do you see where it discusses providing

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1 professional learning?

2 A Yes.

3 Q Am I correct in understanding that you are a
4 certified instructor for positive behavior supports and
5 interventions?

6 A Yes.

7 Q You are also a certified instructor for
8 MindSet as we just discussed?

9 A Yes.

10 Q You are a certified instructor for youth
11 mental health first aid?

12 A Yes.

13 Q What is youth mental health first aid?

14 A Youth mental health first aid is a program
15 where we teach educators, anybody in the community
16 about mental health, about teens, kids, adolescents and
17 mental health issues, keeping them from committing
18 suicide, basically. It's being able to observe those
19 warning signs and be able to intervene and assist them.

20 Q Do you provide that training to your staff?

21 A I do, yes.

22 Q Are all of your staff trained in youth mental
23 health first aid?

24 A Right now, no. They have not, not all of them
25 because I have some new staff, so most of them are. I

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1 would say three-fourths of them are trained.

2 Q How often do you provide the youth mental
3 health first aid training to your staff?

4 A About every two years.

5 Q This also says you are a certified instructor
6 in the Person Brain model?

7 A Yes.

8 Q What is that?

9 A The Person Brain model is a trauma-informed
10 care model that goes deep into brain research and how
11 trauma affects the brain in interactions. It's a
12 two-day training.

13 Q Do you train your staff on the Person Brain
14 model?

15 A Yes.

16 Q How often do you train your staff on that?

17 A Again, about once every two years.

18 Q How many of your staff currently are trained
19 on the Person Brain model?

20 A Again, I would say three-fourths.

21 Q How did you come to be trained in the Person
22 Brain model?

23 A I was trained back in, I want to say, maybe
24 2002. Dr. Paul Baker was another GNETS director who
25 was a neuropsychologist and he created the PersonBrain

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1 model. So I was familiar early on with it and have
2 been trained as an instructor since.

3 Q Was there a cost associated with that
4 training?

5 A Yes.

6 Q Does that come out of your GNETS of Oconee
7 budget?

8 A For the instructor training, yes.

9 Q Are there any other costs associated with the
10 PersonBrain model apart from instructor training?

11 A There's a book and a participant manual that
12 are provided with the training per participant.

13 Q When you train your staff on the PersonBrain
14 model, do you have to pay for each staff member
15 individually?

16 A I pay for just the materials, not the delivery
17 of the instruction.

18 Q Those materials also come out of the GNETS of
19 Oconee budget?

20 A That is correct.

21 Q Moving on, it says you are a certified
22 instructor in deescalation?

23 A Yes.

24 Q Do you train your staff on deescalation?

25 A I do.

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1 Q How often do you train them?

2 A At least yearly and during staff meetings and
3 things like that we'll talk about deescalation.

4 Q Are all of your staff currently trained on
5 deescalation?

6 A Yes.

7 Q What about Life Space Crisis Intervention,
8 what is that?

9 A Life Space Crisis Intervention is a
10 communication model where, when a student is in crisis,
11 where you know how to communicate with them without
12 making that crisis worse as a helper.

13 Q Is it fair to say that's also a deescalation
14 tool?

15 A It is.

16 Q When did you become a certified instructor in
17 Life Space Crisis Intervention?

18 A I'm not a certified instructor. I have
19 attended the full certification which is about
20 350 hours, but I'm not a certified instructor for Life
21 Space Crisis Intervention. But I do re-deliver to my
22 staff.

23 Q How often do you re-deliver that training to
24 your staff?

25 A I would say on the Life Space Crisis

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1 Intervention, every couple of years. I can't say that
2 I have done that every two years.

3 Q How many of your staff are currently trained
4 in Life Space Crisis Intervention?

5 A There are at least ten that are trained in the
6 full model of Life Space Crisis Intervention. Again,
7 I'm not a certified trainer so they go under certified
8 to attend. The whole training is 50 hours.

9 So they have attended that training, not by
10 me. When I say all staff have been trained, they are
11 trained in the concepts but not the full 50 hours under
12 me.

13 Q How did you first become familiar with Life
14 Space Crisis Intervention?

15 A Initially early on in my career, Dr.
16 Mary-Margaret Wood used Life Space Crisis Intervention.
17 She was one of the original people that worked with the
18 creators of Life Space Crisis Intervention. And so for
19 as long as I know, that was one of the very therapeutic
20 tools that our GNETS programs used early on. So that's
21 how I became familiar.

22 Q So other GNETS programs were also using that
23 tool?

24 A Yes.

25 Q Is Mary-Margaret Wood in some way affiliated

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1 with GNETS?

2 A She was the original creator, if you will, of
3 the Psychoeducational Network. The protege model was
4 in Rutland, in Athens, and that was in the 70s.

5 Q So she created effectively the first GNETS
6 program?

7 A She did.

8 Q And then the other regional programs were then
9 sort of expanded or modeled after that?

10 A Correct.

11 Q There's a reference here to classroom
12 management. Do you provide some sort of professional
13 learning or training in classroom management for your
14 staff?

15 A I do.

16 Q What kind of training do you provide?

17 A Classroom management in terms of coaching,
18 coaching students; structuring the school day;
19 providing warnings before transition time; assisting
20 them in organization of materials; making sure the
21 expectations are visible and that you are repeating
22 those to students; generally the positive behavior
23 support intervention, classroom interventions.

24 Q How often do you provide that sort of training
25 to your staff?

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1 A Approximately once a year. And again, we
2 review those on a regular basis during our meetings.

3 Q There's also a reference here to academic
4 support. Do you provide professional learning for your
5 staff on academic support?

6 A Yes.

7 Q What kind of professional learning do you
8 provide?

9 A Again, in terms of academic support, ensuring
10 that they know how to use the data for the academic
11 support, formative assessments, planning instruction,
12 things like that.

13 Q How often does that professional learning
14 occur?

15 A Approximately once a year.

16 Q We are going to talk a little bit about some
17 of your work outside of the GNETS program. You held a
18 number of positions before joining GNETS of Oconee,
19 correct?

20 A (Indicating affirmatively.)

21 Q If we could start with some of the earlier
22 positions.

23 A Okay.

24 Q You have identified on your resume that you
25 served as a psychological specialist at Eckerd Youth

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1 Development Center in Okeechobee, Florida from 1992 to
2 1993; is that right?

3 A That is correct.

4 Q What is Eckerd Youth Development Center?

5 A It is a, similar to youth development centers
6 in Georgia. It is a commitment facility for
7 adjudicated youth.

8 Q When you say adjudicated youth, are you
9 referring to youth in the criminal justice system?

10 A Yes.

11 Q When you say it is a commitment facility, is
12 it actually a juvenile detention center?

13 A Yes.

14 Q Approximately how many youth were at the
15 Eckerd Youth Development Center when you were serving
16 as a psychological specialist?

17 A Approximately three or four hundred. I'm not
18 really positive on that number.

19 Q This says that you provided diagnostic
20 assessment in your capacity as a psychological
21 specialist?

22 A That is correct.

23 Q What kind of diagnostic assessment did you
24 perform?

25 A Mental health assessment to see if there were

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1 mental health needs for the student or the child,
2 adolescent.

3 Q Did you work with all of the youth at the
4 development center or did you have a caseload of sorts?

5 A I had a caseload.

6 Q About how many were on your caseload at any
7 given time?

8 A I don't recall.

9 Q It says here that you also wrote treatment
10 plans?

11 A I did.

12 Q What kinds of things were included in those
13 treatment plans?

14 A Whether a student needed individual
15 counseling, group counseling; if the student was a
16 volatile student, how to help intervene and support the
17 student. I don't recall what else went on the
18 treatment plan.

19 Q Did you actually provide individual counseling
20 in your role as a psychological specialist?

21 A I did.

22 Q Did you provide group counseling?

23 A I did.

24 Q The reference here to the therapeutic process
25 groups, would that be included within the group

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1 counseling that you were referring to?

2 A Yes.

3 Q Moving up, it says from 1993 to 1995 you
4 worked at the Cooperative Learning Center in Asheville,
5 North Carolina?

6 A Correct.

7 Q What is the Cooperative Learning Center?

8 A The Cooperative Learning Center was a program
9 similar to the GNETS program that worked with the
10 school system to provide therapeutic services for those
11 most severe children. So that particular program was
12 between the mental health center and the school system.

13 Q Was it affiliated with a particular county or
14 city school system in North Carolina?

15 A Buckham County Schools.

16 Q Was the Cooperative Learning Center itself a
17 public entity or was it separate from the school
18 system?

19 A I'm not sure.

20 Q What was your title when you were at the
21 Cooperative Learning Center?

22 A I was a therapist.

23 Q How many students were at the Cooperative
24 Learning Center at that time approximately?

25 A Approximately 80.

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1 Q In your role as a therapist, it says that you
2 conducted assessments and developed therapeutic
3 programs for students with severe emotional and
4 behavioral challenges, correct?

5 A Correct.

6 Q What kinds of assessments did you conduct?

7 A Mental health assessments.

8 Q Similar to what you had done at the Eckerd
9 Youth Development Center?

10 A Yes.

11 Q In terms of developing therapeutic programs,
12 is that similar to the treatment plans that you
13 developed when you were at Eckerd?

14 A Yes.

15 Q Was the Cooperative Learning Center a
16 stand-alone facility disconnected from a general
17 education environment or was it --

18 A Yes, it was.

19 Q It was stand-alone?

20 A Yes.

21 Q What was the age range of the students at the
22 Cooperative Learning Center?

23 A I don't recall how young. I know there was
24 middle and high school.

25 Q How did students come to be placed at the

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1 Cooperative Learning Center, was there a process for
2 that?

3 A Through the IEP.

4 Q Next it says from 1996 to 1998 you served as a
5 behavior specialist at Baldwin State Prison; is that
6 right?

7 A That's correct.

8 Q What's the security level of that prison?

9 A I believe it's a Level 5.

10 Q Do you know where Level 5 would fall in terms
11 of minimum, medium or maximum security?

12 A It was a maximum but it was, the Level 5 was
13 because of the mental health challenges of the inmates
14 and the severity. So as I understood it, it was the
15 most, not the most secure, second to the most secure as
16 far as a secure facility for inmates with mental health
17 issues.

18 It was also a diagnostic prison. So inmates
19 that were just coming into the system would go through
20 that program.

21 Q When you say it was a diagnostic prison, they
22 would come to that facility in order to be assessed for
23 a determination as to what their state was and where
24 they should go after that?

25 A Correct.

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1 Q Here it says as behavior specialist, you
2 performed diagnostic mental health assessment and
3 evaluation of inmates, right?

4 A Correct.

5 Q In terms of those mental health assessments,
6 was there anything different in sort of nature or
7 quality from the kinds of assessments that you had done
8 at the Cooperative Learning Center or at the Eckerd
9 Youth Development Center?

10 A I would say that I would give a diagnostic
11 impression which I wasn't at that, I didn't do that for
12 the Cooperative Learning Center.

13 Q What's the difference between a diagnostic
14 impression and the kinds of assessments that you did at
15 the Cooperative Learning Center?

16 A In terms of assessment, it was the same kind
17 of mental health assessment in terms of what the State
18 was of the person, but when I say gave them a
19 diagnostic impression from the DSM-IV at the time, I
20 think it was even III at the time, where I came up with
21 an actual mental health diagnosis that I would provide
22 to the psychiatrist who would either confirm or come up
23 with their own diagnosis.

24 Q Is that called a diagnostic impression because
25 you are not actually a medical doctor?

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1 A That's correct.

2 Q Would it be fair to say it is part of a
3 recommendation of a diagnosis that the doctor would
4 review and sign off on or modify?

5 A Yes.

6 Q Did you provide any sort of counseling to
7 inmates when you were a behavior specialist at Baldwin
8 State Prison?

9 A Yes.

10 Q What kind of counseling did you provide?

11 A Just group therapy, really in terms of their
12 mental health issues, learning coping mechanisms,
13 social skills, things like that.

14 Q You were a licensed clinical social worker at
15 the time you were serving at Baldwin State Prison?

16 A Yes.

17 Q Moving on, it says from 2009 to 2016 you
18 served as a crisis response team member for River Edge
19 Behavioral Health?

20 A Correct.

21 Q Tell me about that position.

22 A It was a position that was through River Edge
23 Behavioral Health. They had a contract through the
24 local emergency room and so I would provide mental
25 health assessments to patients coming into the

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1 emergency room.

2 Q So you physically worked in the emergency room
3 with patients coming in?

4 A Correct.

5 Q What's River Edge Behavioral Health?

6 A It is a mental health facility here in Baldwin
7 County that serves children all the way up through
8 adulthood.

9 Q Is that a residential facility or do they do
10 outpatient work?

11 A They have a crisis facility here in Baldwin
12 that is more short stay, but part of River Edge does
13 have a crisis stabilization unit. But the one that I
14 was at was more of a day treatment, some people were on
15 day treatment, some people were coming in for
16 assessment counseling.

17 Q Is that mental health facility a public
18 facility or a private facility?

19 A Public facility.

20 Q Is it affiliated with a community service
21 board in any way?

22 A I believe so.

23 Q It says here that you did provide counseling
24 in connection with this role as well?

25 A Yes. I was a crisis team member but I also

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1 did private counseling at the center, providing like
2 parent counseling, parent support groups and individual
3 counseling.

4 Q Did you provide any counseling to children?

5 A I did.

6 Q Is there any overlap between the children
7 served at River Edge Behavioral Health and the children
8 served at GNETS of Oconee?

9 A No.

10 Q What is that based on?

11 A I'm not sure what your question is.

12 Q You said that there's no overlap and I just
13 want to make sure I understand the answer. Is that no
14 overlap in terms of the children that you worked with
15 or no overlap in terms of children who have been served
16 at any time at River Edge and GNETS of Oconee?

17 A There may have been students at GNETS of
18 Oconee that were served at River Edge. They were not
19 my clients. I did not serve any of those kids.

20 Q Understood. In terms of the mental health
21 assessment and evaluation that you did with River Edge,
22 were those sort of assessments minus diagnostic
23 impressions or were you doing diagnostic impressions
24 here as well?

25 A I was doing diagnostic impressions and they

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1 were assessments for the dangerousness of the patients
2 coming in as opposed to if they were harmful to self or
3 others.

4 Q So you were screening for harm to self and
5 others?

6 A Yes.

7 Q Finally here, it says from 2018 to the present
8 that you have been affiliated with Foothills Charter
9 Education High School. Do you see that?

10 A Yes.

11 Q Foothills Charter Education High School is
12 located at Baldwin High School?

13 A It is.

14 Q How does it work to have two high schools in
15 the same place?

16 A It is a charter system that pays, I don't know
17 if they pay rent, but we utilize Baldwin's facility but
18 they are two separate programs completely.

19 Q Is it located in a particular separate area or
20 wing of Baldwin High School?

21 A Yes, it's a night school.

22 Q This is a night school for high school
23 students?

24 A It is.

25 Q How do students come to be affiliated with

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1 Foothills Charter Education High School?

2 A They enroll and it's a regular high school but
3 it's just a different way to provide high school
4 services in terms of, it's a night school so we have a
5 lot of students that work during the day, things like
6 that. So it enables them to finish their high school
7 education.

8 Q Is this school geared towards any particular
9 population of student?

10 A No.

11 Q It says here that you are the assistant psych
12 coordinator for that school?

13 A Correct.

14 Q You are also a social worker for the school?

15 A Correct.

16 Q So you conduct individual and group counseling
17 sessions with Foothills Charter Education High School
18 students?

19 A Correct.

20 Q Are those individual and group counseling
21 sessions also in the evening?

22 A Correct.

23 Q Given that it sounds like this school does not
24 target a particular student population, what kinds of
25 things are you covering in those therapy sessions?

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1 A A lot of our kids come in with anxiety issues.
2 Some of them have mental health issues. Some of them
3 have traumatic backgrounds. Some of them come from
4 poor environments. So it's really helping them come
5 and learn coping skills, things like that.

6 Q I take it there is no overlap between any
7 student in Foothills Charter Education High School and
8 a student who might be served in GNETS of Oconee?

9 A Correct.

10 Q Your resume also says that you served as
11 president of the Georgia Network for Educational and
12 Therapeutic Support in 2001; is that right?

13 A Yes.

14 Q Was that an appointed position?

15 A Yes.

16 Q Who appointed you as president?

17 A Fellow directors.

18 Q What were your responsibilities as president?

19 A To arrange the meetings for the directors; to
20 help provide professional learning; to work with, we
21 had different committees so we would work together to
22 provide professional learning, accountability, things
23 like that.

24 Q You said that one of your responsibilities was
25 to arrange the meetings for the directors. What

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1 meetings are you referring to?

2 A We have four directors' meetings a year.

3 Q I'm sorry, you said had or have?

4 A Under -- well, we used to have a president
5 under GNETS and that person worked closely with the
6 DOE. Since it's been several years now that there is
7 no -- the executive committee for GNETS was dissolved
8 where there was no official president of the network.
9 So we still do meet. In fact, we meet monthly now as
10 GNETS directors.

11 Q So this role as president was connected to the
12 GNETS executive committee?

13 A Correct.

14 Q So you served on the GNETS executive committee
15 and then you were also president of the network?

16 A That is correct.

17 Q You said the GNETS executive committee no
18 longer exists?

19 A Not that I'm aware -- I don't know if there is
20 an executive committee anymore.

21 Q Did you continue to serve on the GNETS
22 executive committee after you were no longer president?

23 A No.

24 Q Is it correct that GNETS of Oconee serves
25 students from multiple school systems?

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1 A Correct.

2 Q How many school systems does GNETS of Oconee
3 presently serve?

4 A Presently, six.

5 Q Which schools systems are those?

6 A Baldwin, Hancock, Putnam, Johnson, Washington
7 and Wilkinson.

8 Q Has the group of school systems that GNETS of
9 Oconee serves changed at all in the last five to seven
10 years?

11 A Not in the last five to seven years.

12 Q Were there any changes to the group of school
13 systems that it served that extend farther back beyond
14 that?

15 A Yes.

16 Q What changes are those?

17 A Jasper County was in our catchment area and
18 Jasper County is now served by Elam Alexander in Macon.

19 Q When did that change occur?

20 A I'm not exactly sure what year, but it was, I
21 want to say, approximately ten years ago.

22 Q What was the reason for the change?

23 A We had a very severe student that, as I
24 recall, the director felt like he would be best served
25 at Elam Alexander.

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1 Q When you say the student was very severe, why
2 do you say that?

3 A He was very physically aggressive.

4 Q Did you have any understanding as to why the
5 director felt that student would be better served at
6 Elam Alexander?

7 MR. NGUYEN: Object to the form.

8 You may answer the question.

9 THE WITNESS: Okay.

10 A I don't know if that was the only reason. I
11 know they were transporting students to the Blind
12 Academy so transportation-wise, it was more efficient
13 for them, as I understand it. I really don't remember
14 all the details.

15 Q Was the student blind?

16 A No. What I mean was it was right down the
17 road, so it was easier to transport them both.

18 Q I understand. Did the director tell you
19 anything else about why the director felt the student
20 would be better served at Elam Alexander?

21 A Not that I recall.

22 Q Does GNETS of Oconee serve students at a
23 single site or at multiple sites?

24 A Currently, at multiple sites.

25 Q How many sites does GNETS of Oconee have?

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1 A We have 11 classrooms.

2 Q 11 classrooms?

3 A Yes, and some of those are, there's two
4 classrooms at Lakeview Academy here in Baldwin, two
5 classrooms at the Oak Hill Middle School, two at
6 Baldwin High School and then we have some in Wilkinson,
7 one classroom in Putnam. We no longer have a classroom
8 in Hancock, and then Washington and Johnson.

9 Q So you served Hancock but you don't have any
10 sites in Hancock?

11 A That is correct.

12 Q Do you have any students currently being
13 served at GNETS of Oconee whose home school system is
14 Hancock?

15 A Yes, one.

16 Q Where is that student being served?

17 A At Washington County High School GNETS.

18 Q When was the last time you had a site at
19 Hancock?

20 A Approximately two or three years ago.

21 Q What was the reason for discontinuing that
22 site?

23 A We didn't have the staff support.

24 Q Was the lack of staff support a hiring issue
25 in terms of availability of staff or was it a budget

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1 issue, was there some other reason?

2 A It was a budget issue. So the numbers were so
3 low in Hancock County and we had needs in other places
4 so that teacher had to be reassigned to a different
5 location so that we can serve those students in the
6 most efficient budget-wise.

7 Q Understood. Has GNETS of Oconee always served
8 students in multiple sites?

9 A Not always. We were a center-based program
10 approximately six years ago where we had a center base
11 and then we had one satellite classroom out in Johnson
12 County.

13 Q When did GNETS of Oconee make the transition
14 from center-based to entirely school-based?

15 A Approximately six years ago.

16 Q So sometime around 2016?

17 A I think so.

18 Q What was the reason for that transition?

19 A The board at the time felt that they would be
20 best served in the local school systems. The
21 Department of Education in Georgia basically told us
22 that we would have to move out of the facility. There
23 was not another facility for us to move into, so the
24 board decided that we should be spread out.

25 Q When you say board, are you referring to the

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1 RESA Board of Control?

2 A Yes.

3 Q You said that the Georgia Department of
4 Education told you that you would have to move out of
5 the facility; is that right?

6 A Yes, the State Board.

7 Q Did the State Board give a reason as to why
8 GNETS of Oconee had to move out of the center facility?

9 A One of the facilities which was a cafeteria
10 was a very old building and they felt it wasn't
11 suitable for students.

12 Q Has GNETS of Oconee considered any changes to
13 its multi-site structure?

14 A In what way?

15 Q Have you considered going back to a center
16 model?

17 A As far as GNETS of Oconee, I know the board
18 has discussed possibly working together for a
19 center-based model. Baldwin County has discussed
20 having a center-based model for those students, but
21 nothing has been, you know, there's no decision has
22 been made to actually do that.

23 MS. GARDNER: I am going to hand to the court
24 reporter what I'd like to have marked as
25 Plaintiff's Exhibit 465.

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1 (Plaintiff's Exhibit 465 was marked for
2 identification.)

3 (Witness reviewing document.)

4 BY MS. GARDNER:

5 Q Ms. Wolf, you have been handed what's been
6 marked as Plaintiff's Exhibit 465. This is an email
7 from you to Vickie Cleveland dated January 5, 2018.
8 The subject line, Re: GNETS systemic reintegration
9 planning, and the first page of this document is Bates
10 stamped GA00014956.

11 Do you recognize this?

12 A Yes.

13 Q I believe you said earlier that Vickie
14 Cleveland was the GNETS program manager at the State
15 Department of Education; is that correct?

16 A That is correct.

17 Q This email that you sent to Ms. Cleveland is
18 in response to an earlier email that Ms. Cleveland sent
19 to you and several others, correct?

20 A Yes.

21 Q That email was dated January 4, 2018 and the
22 subject is GNETS systemic reintegration planning; is
23 that right?

24 A Yes.

25 Q Are the other people copied on Ms. Cleveland's

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1 January 4, 2018 email, other GNETS directors?

2 A Yes.

3 Q So in Ms. Cleveland's email, she says, "See
4 the attached GNETS systemic reintegration planning
5 document. This document will provide guidance for LEAs
6 that may be considering a large
7 reintegration/relocation process."

8 Do you see that?

9 A Yes.

10 Q In your response to Ms. Cleveland, you say,
11 "Our program is already in year two of the
12 reintegration into our system after our facility was
13 closed in 2016."

14 A Yes.

15 Q "I am assuming that we do not have to do this
16 since we have worked through all of these issues
17 already but I wanted to make sure."

18 Do you see that?

19 A I do.

20 Q When you reference the reintegration into your
21 system after your facility was closed, what are you
22 referring to in terms of reintegration?

23 A Having students move from a center-based model
24 to being served in the schools.

25 Q I assume that the reference here to the

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1 facility closing is what we just discussed with the
2 State Department of Education telling GNETS of Oconee
3 that the building was unsuitable?

4 A Correct.

5 Q How did that process of the State Department
6 of Education telling unfold?

7 A It wasn't the Department of Education, it was
8 the State Board, State Education Board.

9 Q The State Education Board?

10 A As I understood it.

11 Q Did GNETS of Oconee receive a letter from the
12 State Board of Education about this?

13 A I don't remember a letter. I remember, I'm
14 trying to think of how we found out. It was a State
15 Board presentation that said that nine facilities would
16 be closing. I don't remember getting an official
17 letter.

18 Q Have there been any sort of facilities
19 inspection of the GNETS of Oconee center prior to your
20 being notified that the center needed to be closed?

21 A Yes, there was an independent contractor that
22 came in and toured the facility, took pictures, things
23 like that.

24 Q Was GNETS of Oconee required to complete a
25 reintegration plan at the time the facility was closed?

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1 A To be honest, I don't remember the
2 reintegration plan.

3 Q You said that there were independent
4 contractors who conducted a facility inspection. Were
5 those independent contractors working for the Georgia
6 Department of Education?

7 A I don't know who they worked for.

8 MR. NGUYEN: At a good breaking point, can we
9 break?

10 MS. GARDNER: Just after this document, we can
11 break.

12 MR. NGUYEN: That's fine.

13 MS. GARDNER: I would like to have the court
14 reporter please mark this document as Plaintiff's
15 Exhibit 466.

16 (Plaintiff's Exhibit 466 was marked for
17 identification.)

18 (Witness reviewing document.)

19 BY MS. GARDNER:

20 Q Ms. Wolf, you have been handed what has been
21 marked as Plaintiff's Exhibit 466. This is an email
22 from you to Vickie Cleveland dated April 8, 2019 with
23 the subject: Forward: Possible regional GNETS center
24 visit. The first page of this document is Bates
25 stamped GA00343802.

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1 Do you recognize this?

2 A I do.

3 Q In this email, you forward an earlier email
4 that you received to Ms. Cleveland, correct?

5 A Yes.

6 Q Am I correct in understanding that that
7 earlier email is an email from Hayward Cordy to you and
8 to Vickie Cleveland also dated April 8, 2019?

9 A Yes.

10 Q Who is Hayward Cordy?

11 A At the time he was the Oconee RESA director.

12 Q So at the time he would have been the person
13 you reported directly to?

14 A Yes.

15 Q I think you said as pertained to fiscal and
16 personnel issues earlier?

17 A Yes.

18 Q In the email Hayward Cordy says, "Good
19 afternoon, Pat. I recently heard back from Dr. Price,
20 Baldwin County Superintendent of Schools regarding a
21 tour of Sandersville Elementary School as a possible
22 GNETS regional center location. She is interested in
23 touring the facility."

24 Do you see that?

25 A Yes.

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1 Q And farther down, Hayward Cordy says, "I am
2 copying Ms. Vickie Cleveland on this email in the hope
3 that she and someone from the GaDOE Facilities Division
4 will be able to participate in the building
5 walk-through. As learned from our visit, the wing that
6 we are interested in was built in 1995 and has a
7 current certificate of occupancy and working fire alarm
8 system and is ADA compliant."

9 Do you see that?

10 A I do.

11 Q At the time was Sandersville Elementary School
12 being considered as a possible site for a regional
13 center within GNETS of Oconee?

14 A It was, yes.

15 Q Had there been any discussion as to the role
16 that center would play if it were opened?

17 A It would, if it were opened, it would be a
18 regional program similar to the center-based model.

19 Q That you had previously had?

20 A Yes.

21 Q Had you visited Sandersville Elementary School
22 at the time you received this email?

23 A Yes.

24 Q When you visited Sandersville Elementary
25 School before receiving this email, were you visiting

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1 it with anyone else?

2 A Dr. Cordy visited it with me.

3 Q Was that facility in terms of the area that
4 GNETS of Oconee was considering, was it a wing of a
5 larger building that you were considering using?

6 A It was, yes.

7 Q Was the remainder of that building actively
8 being used as an elementary school?

9 A No.

10 Q Was it being used for anything?

11 A It was being used for some community affairs
12 things. I don't remember the specific name of the
13 program.

14 Q Was there any sort of alternative school in
15 that building?

16 A Not that I'm aware of.

17 Q This email says that Dr. Price is interested
18 in touring the facility. Did you understand why Dr.
19 Price was interested in doing that?

20 A She was determining whether she wanted to have
21 her students sent to the program, to that center-based
22 model.

23 Q Hayward Cordy here expresses a hope that
24 Vickie Cleveland and someone from the Georgia DOE
25 Facilities Division would be able to participate in Dr.

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1 Price's walk-through. Did you share that hope?

2 A That they would approve the facility?

3 Q That they would participate in the
4 walk-through.

5 A I really didn't have an opinion on whether
6 they participated or not.

7 Q Did Hayward Cordy discuss with you at all why
8 he hoped that someone from the Georgia Department of
9 Education Facilities Division would be able to visit?

10 A Because if they were going to go to a
11 center-based model, it would have to be approved by the
12 Department of Education and the Facilities.

13 Q So that was the reason for asking Vickie
14 Cleveland and somebody from the State Department of
15 Education Facilities Division to participate in the
16 walk-through?

17 A As I understood it, yes.

18 Q Did you receive a reply from Ms. Cleveland to
19 your email asking her if she could attend the tour?

20 A I do not recall.

21 Q Do you recall whether Ms. Cleveland or anybody
22 from the Georgia Department of Education Facilities
23 Division actually visited Sandersville Elementary
24 School?

25 A I do not believe they did.

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1 Q Do you have any understanding of the reason
2 that they did not?

3 A I don't recall.

4 MS. GARDNER: I think we can take a break now.

5 THE VIDEOGRAPHER: We are off the record at
6 10:34 a.m.

7 (Recess.)

8 THE VIDEOGRAPHER: We are back on the record
9 at 10:43 a.m.

10 BY MS. GARDNER:

11 Q We were talking earlier, I believe that you
12 already referenced fiscal agents, but does GNETS of
13 Oconee have what is known as a fiscal agent?

14 A We do.

15 Q Who is that fiscal agent?

16 A Oconee RESA.

17 Q So we are on the same page, what is the role
18 of GNETS of Oconee's fiscal agent?

19 A To provide the oversight in terms of budgets,
20 fiscal, personnel issues and so forth.

21 Q What role in particular do they play with
22 respect to budget and fiscal matters?

23 A They oversee the budget, we'll come up with
24 the budget and they look at it first and then they
25 bring it before the board for approval.

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1 Q When you say they bring it before the board,
2 are you talking about the RESA Board of Control?

3 A I am.

4 Q Where do the funds that go into GNETS of
5 Oconee's budget come from?

6 A There's a state grant and a Federal grant.

7 Q When you say there's a state grant, those are
8 grant funds from the State of Georgia?

9 A Yes.

10 Q And then there's also a Federal grant, you
11 said?

12 A Yes.

13 Q Is there any other source of funds for the
14 GNETS of Oconee budget apart from the State of
15 Georgia's grant or the Federal grant?

16 A Right now, there's a therapeutic services
17 grant and that is under the ESA 3, I'm not sure what
18 that stands for. I know that's one of the grant pieces
19 that we get.

20 And then we also get another therapeutic
21 services grant for being in a rural area and not having
22 that access to the therapeutic support, some
23 therapeutic support.

24 Q Are those therapeutic services grants, State
25 grants?

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1 A I'm not sure.

2 Q Do you communicate with anybody about those
3 grants?

4 A In what way?

5 Q Let me ask it this way: How long has GNETS of
6 Oconee received these two therapeutic services grants?

7 A The one grant for the past, we're in our
8 second year. We get three years and that's under the
9 ESA 3 grant. The therapeutic services grant, I believe
10 it's been three or four years.

11 Q When you say those are therapeutic services
12 grants, what are those grants used for?

13 A Providing a therapist or behavior support for
14 the purpose of therapeutic services.

15 Q Any other component of GNETS of Oconee's
16 budget that we haven't discussed yet?

17 A None that I know of.

18 Q You said that GNETS of Oconee prepares a
19 budget and then I believe you said that, is it voted on
20 by the RESA Board of Control?

21 A Yes.

22 Q In terms of the total amount of funds in the
23 budget for any given year, how do you get that
24 information?

25 A From the Georgia Department of Education.

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1 Q Is there a particular timeline in which you
2 receive that information?

3 A We usually -- you mean what month out of the
4 year? Typically, it's April or May of each year.
5 Sometimes it varies.

6 Q Do you submit anything to the Georgia
7 Department of Education in advance of receiving that
8 information?

9 A No.

10 Q There's no sort of grant application or
11 anything like that?

12 A Yes, I'm sorry, I didn't realize that's what
13 you were talking about. Yes, we do a grant proposal
14 every year and that's part of our budget package.

15 Q That's submitted to the Georgia Department of
16 Education?

17 A It is.

18 Q Roughly when during the year do you submit
19 that to the Georgia Department of Education?

20 A Approximately in June.

21 Q You said earlier that typically the Georgia
22 Department of Education lets you know in April or May
23 how much money is in your budget. That's the correct
24 timeline?

25 A They give a tentative budget at that time and

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1 then at some point that's approved and we get the
2 actual amounts. I really, I don't know what month, I
3 think it varies from year to year. But generally, June
4 is where we have the final funds and we do the grant
5 proposal and submit all that.

6 Q Just so I'm clear, do you get the tentative
7 amount of money in GNETS of Oconee's budget from the
8 Georgia Department of Education before you submit the
9 grant proposal or after?

10 A Before.

11 Q Then you submit the grant proposal?

12 A Yes.

13 Q And then there is a final allocation that
14 comes out after you submit the grant proposal?

15 A Yes. I'm not sure if it's before or after,
16 but yes. Generally, it's right around the same time.

17 Q Do you have regular meetings with Oconee RESA
18 regarding GNETS of Oconee?

19 A Yes.

20 Q Are those connected to the monthly update that
21 I believe you said you prepared?

22 A With the RESA Board of Control, yes.

23 Q Who attends those meetings?

24 A The superintendents from the six systems we
25 serve as well as Georgia College and Central Georgia

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1 Tech representatives and the executive director of
2 RESA.

3 Q Does GNETS of Oconee have an advisory board?

4 A That is our advisory board.

5 Q The RESA Board of Control is the advisory
6 board?

7 A Yes.

8 Q How many people did GNETS of Oconee have on
9 staff in the 2021-22 school year?

10 A Approximately 28, I think.

11 Q What about in the current 2022-23 school year,
12 how many people are on staff at GNETS of Oconee?

13 A It's about the same.

14 MS. HERNANDEZ: Sorry to interrupt. Is there
15 any way you can move your microphone higher up to
16 your mouth? It is hard to hear you. I'm talking
17 about Kelly.

18 MR. NGUYEN: Danielle, are you hearing Ms.
19 Wolf okay?

20 MS. HERNANDEZ: I can. Kelly is just kind of
21 going in and out.

22 MS. GARDNER: Can you hear me now, Danielle?

23 MS. HERNANDEZ: Yes, thank you.

24 BY MS. GARDNER:

25 Q So you said there are about the same number of

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1 people on staff in this current 2022-23 school year?

2 A In terms of the staffing pattern, yes.

3 Q Are there any contracted positions at GNETS of
4 Oconee that are not included within those staffing
5 numbers you just gave me?

6 A No, the one that is contracted is included in
7 that staffing pattern.

8 Q Does GNETS of Oconee currently have any
9 vacancies.

10 A Yes.

11 Q How many vacancies do you have right now?

12 A Currently, I believe we have, off the top of
13 my head, five or six paraprofessional vacancies.

14 Q Do you have any teacher vacancies right now?

15 A We do not.

16 Q Any other vacancies apart from
17 paraprofessionals?

18 A The executive secretary is a vacant position,
19 but I do contract with her. That's another person I
20 contract with.

21 Q So you don't have a full-time executive
22 secretary, but you contract with a person who
23 previously served in the full-time executive secretary
24 role?

25 A I do, correct.

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1 Q What are that person's responsibilities?

2 A She will process the staff leave. She assists
3 with program evaluation in terms of reports that are
4 due, make sure that the teachers turn their things in
5 on time. She also sends out various reports that we do
6 during the year to the teachers, things like that.

7 Q Approximately how many students were served at
8 GNETS of Oconee in the 2021-22 school year?

9 A Approximately 85.

10 Q Approximately how many students are being
11 served at GNETS of Oconee in this current 2022-23
12 school year?

13 A It's about the same. It's about the same.

14 Q Are these numbers of students served
15 consistent with the number of students who have been
16 served for the last five or so years or have there been
17 fluctuations?

18 A Usually by the end of the year, we serve
19 approximately anywhere from 90 to a hundred students so
20 I think we are pretty consistent with that. Maybe our
21 numbers have declined a little bit.

22 Q Do you find that typically you start the year
23 with a smaller student population and then the
24 population grows as the year goes on?

25 A Always. We have students that move out,

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1 students that come in, transfer in, things like that.

2 MS. GARDNER: I'd like to ask the court
3 reporter to mark this document as Plaintiff's
4 Exhibit 467.

5 (Plaintiff's Exhibit 467 was marked for
6 identification.)

7 (Witness reviewing document.)

8 BY MS. GARDNER:

9 Q Ms. Wolf, you have been handed what's been
10 marked as Plaintiff's Exhibit 467. This is a document
11 with the caption at the top, GNETS of Oconee total
12 students served by year. Do you recognize this
13 document?

14 A Yes.

15 Q Is this a document that you produced in
16 response to the United States subpoena to GNETS of
17 Oconee?

18 A I am -- I don't remember if that's the reason
19 that I produced the document, but I know I produced it.

20 Q Did you prepare this document?

21 A I did.

22 Q This document shows the number of students
23 served in GNETS of Oconee by, broken down by their home
24 county school system; is that right?

25 A Correct.

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1 Q And it also breaks student enrollment down by
2 school year or the school year, I should say?

3 A Yes.

4 Q Can you explain what the difference is between
5 cumulative count and in class currently?

6 A Yes, so cumulative count is the count of the
7 students served through that entire fiscal year and the
8 in class currently is whoever at that one snapshot in
9 time, the number of students served.

10 Q So a cumulative count would include a student
11 who may have been served for several months at the
12 beginning of the year but isn't present on the day a
13 snapshot is taken whereas the current in class count is
14 just on a given day, these are the number of students
15 presently here?

16 A So the cumulative is any student that has been
17 served within that fiscal year. So they are not
18 included in the snapshot necessarily, if that makes
19 sense.

20 Q Right. And that is the reason why
21 consistently across the fiscal years appearing on this
22 sheet, the cumulative count is higher than the in class
23 count?

24 A Correct.

25 Q Is there a specific date on which the in class

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1 count generally occurs?

2 A No.

3 Q So it is not consistent like a month every
4 year?

5 A No, like every month I will give that count to
6 the RESA Board of Control for the in class count.

7 Q For example, if you look at the bottom, it
8 says, "Students Served FY20."

9 Do you see that chart?

10 A Yes.

11 Q There's no way to tell from this chart the
12 date that the in class count was taken?

13 A Correct.

14 Q For the top chart where it says, "Students
15 Served FY22 to Date, as of 9-22-21," does that 9-22-21
16 date indicate that that is the date of the in class
17 count of students served for the fiscal year 2022 to
18 date?

19 A Yes.

20 MS. GARDNER: I would like to ask the court
21 reporter to mark this document as Plaintiff's
22 Exhibit 468.

23 (Plaintiff's Exhibit 468 was marked for
24 identification.)

25 (Witness reviewing document.)

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1 BY MS. GARDNER:

2 Q Ms. Wolf, you have been handed what's been
3 marked as Plaintiff's Exhibit 468. Are you familiar
4 with this document?

5 A Yes.

6 Q Am I correct that this is a GNETS of Oconee
7 brochure?

8 A Yes.

9 Q Who created this document?

10 A I did.

11 Q How do you use this document at GNETS of
12 Oconee?

13 A We provide this information to our parents and
14 other stakeholders.

15 Q This document provides various information
16 about GNETS of Oconee?

17 A Yes.

18 Q On the left hand of this first page, the
19 brochure says that, "Our students participate in a
20 meaningful way in their IEP through the ASPIRE program.
21 They help identify goals, attend their meetings and
22 share their successes with the IEP team."

23 Do you see that?

24 A I do.

25 Q What is the ASPIRE program?

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1 A It is a student engagement program where
2 students participate, just what it says, participate in
3 their IEP.

4 Q How long has the ASPIRE program been used at
5 GNETS of Oconee?

6 A For approximately, I want to say maybe eight
7 years.

8 Q How did GNETS of Oconee come to be connected
9 to the ASPIRE program?

10 A The GNETS directors were presented information
11 on ASPIRE at one of our directors' meetings and we were
12 one of the initial pilot programs, I believe. There
13 was maybe two or three other GNETS programs that
14 participated and we have been using it ever since.

15 Q Who presented information about ASPIRE at that
16 GNETS director meeting?

17 A If I recall, it was Elise James.

18 Q Who is Elise James?

19 A I don't know her exact title, but she works
20 for the Department of Education.

21 Q You said GNETS of Oconee became one of the
22 participants in an initial pilot program?

23 A (Indicating affirmatively.)

24 Q Was that a pilot program for GNETS programs in
25 particular?

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1 A No.

2 Q It was the initial pilot program for the
3 ASPIRE program in general?

4 A Correct.

5 Q What did being a member of the initial pilot
6 program entail?

7 A Consisted of training and student engagement,
8 you know, involving students in their own education
9 planning process, self-advocacy.

10 Q Did GNETS of Oconee work with any external
11 consultants in setting up its involvement with ASPIRE?

12 A Not that I know of.

13 Q Do all GNETS of Oconee students participate in
14 the ASPIRE program?

15 A To the extent that they are able, yes.

16 Q When you say to the extent that they are able,
17 are there circumstances in which students are not able?

18 A There are cases where, for instance, a student
19 maybe with extreme anxiety doesn't want to come
20 physically to the IEP team, so we come up with other
21 creative ways for them to be involved, PowerPoint
22 presentations, things like that.

23 Q If you turn to the second page of the
24 brochure, do you see the section that says About Us?

25 A I do.

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1 Q If you look about midway down that paragraph
2 it says, "GNETS programs provide comprehensive,
3 educational and therapeutic support services to
4 students who might otherwise require residential or
5 other more restrictive placements due to the severity
6 of one or more of the characteristics of the disability
7 category of emotional and behavioral disorders (EBD)."

8 Do you see that?

9 A I do.

10 Q Does GNETS of Oconee collect any data
11 regarding the extent to which the program has prevented
12 students from requiring residential or other more
13 restrictive placements?

14 A Can you repeat the question?

15 Q Sure. I'm just wondering if GNETS of Oconee
16 collects any data about the extent to which students
17 have been prevented from going into residential
18 treatment or requiring other more restrictive
19 placements.

20 A We do collect data on the number of students
21 that have been hospitalized during the GNETS program.
22 I don't know if there's any data that we collect
23 showing that we prevent residential placements.

24 Q But you do collect data on the number of GNETS
25 of Oconee students who are hospitalized in a given

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1 year?

2 A Yes.

3 Q This references other more restrictive
4 placements. What are those other more restrictive
5 placements apart from hospitalization?

6 A In terms of a possible referral to the
7 Department of Juvenile Justice, so it would be
8 incarceration, group homes, things where they are not
9 served in their community.

10 Q Does GNETS of Oconee keep data on the number
11 of students who are referred to the Department of
12 Juvenile Justice during a given year?

13 A We don't always know those numbers exactly,
14 but at times, yes. There has been times over the
15 course of my career, but it hasn't occurred on a
16 regular basis.

17 Q Do you do anything with the data that you
18 collect on the number of students who have been
19 hospitalized across a given year?

20 A We share that information with the Department
21 of Education.

22 Q Approximately how many students during the
23 last school year were hospitalized?

24 A I'm not really sure.

25 Q Moving to the section on the second page that

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1 says Referral, do you see that section?

2 A (Indicating affirmatively.)

3 Q It says here at the beginning of the second
4 paragraph, "An IEP team may consider in-class services
5 via GNETS program for a child with an emotional and
6 behavioral disorder based on documentation of the
7 severity of the duration, frequency and intensity of
8 one or more of the characteristics of the disability
9 category of emotional and behavioral disorders (EBD)."

10 Do you see that?

11 A I do.

12 Q What are in-class services?

13 A That would be a self-contained class that is
14 particularly dedicated to GNETS.

15 Q Are there GNETS services that are not in-class
16 services?

17 A Yes, we provide consultation. We'll go in and
18 assist with behavior intervention planning,
19 observation, things like that.

20 Q How often in a given school year would you say
21 you provide consultative services?

22 A Approximately five to ten times a year.

23 Q Does GNETS of Oconee provide home-based
24 services?

25 A Provide what?

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1 Q Home-based services?

2 A Home-based services, we do not. The local
3 school systems provide home-based services.

4 Q So if a student needs home-based services,
5 they would go through their county school system for
6 that?

7 A Yes.

8 Q Has GNETS of Oconee served students who ended
9 up needing home-based services?

10 A Yes.

11 Q How many students last school year would you
12 say fell into that category?

13 A I'm not really sure, possibly five.

14 Q You said the LEA provides those home-based
15 services?

16 A Yes.

17 Q Does GNETS of Oconee have any involvement in
18 the process once a determination is made that a student
19 needs home-based services?

20 A I do have some teachers that contract with the
21 school system to provide services, but it's not, they
22 are through, they are contracted through those systems.

23 Q Those are GNETS of Oconee teachers?

24 A Yes, in some cases.

25 Q In those cases where GNETS of Oconee teachers

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1 contract with the school system to provide home-based
2 services, are those services being provided during the
3 typical school day?

4 A No.

5 Q How is a determination made whether a student
6 gets home-based services?

7 A If the IEP determines that that student's
8 behaviors are so extreme as to be dangerous in the
9 school setting.

10 Q To clarify, we have been talking about
11 home-based services. Does a student who is on a
12 part-day schedule necessarily receive home-based
13 services?

14 A Not necessarily.

15 Q So a student could be on a part-day school and
16 not receive home-based services?

17 A Correct.

18 Q Does GNETS of Oconee have students on part-day
19 schedules?

20 A Yes, we do.

21 Q How many students during the last school year
22 would you say were on part-day schedules?

23 A I'm not really sure how many.

24 Q Do you have a ballpark?

25 A My guess would be ten to twelve.

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1 Q Are there students at GNETS of Oconee who are
2 on a part-week schedule?

3 A Yes.

4 Q Can you explain the difference between a
5 part-day schedule and a part-week schedule?

6 A Yes, a part-day schedule would be typically
7 five days a week for a certain amount of hours per day
8 and a part-week schedule would be coming however many
9 times during the week.

10 Q For a student on a part-week schedule, is it
11 consistent that being on a part-week schedule doesn't
12 necessarily mean that they are receiving home-based
13 services?

14 A Correct.

15 Q During the last school year, the 2021-22
16 school year, how many GNETS of Oconee students were on
17 part-week schedules?

18 A Approximately, I'm just guessing, I really
19 don't know.

20 Q Is it more than ten?

21 A I don't know.

22 Q But you do know you had some students on a
23 part-week schedule?

24 A I do.

25 Q Moving down to the bottom of the referral

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1 section, the very last sentence there says, "For
2 children receiving in-class services, local schools are
3 actively involved and exit criteria are developed upon
4 entry into the GNETS program."

5 Do you see that?

6 A Yes.

7 Q What does it mean when it says local schools
8 are actively involved?

9 A That refers to the IEP team having the local
10 educational authority along with the other members of
11 the IEP team to determine what the student's IEP goals,
12 what they are to meet on their IEP goals in order to
13 exit the GNETS program.

14 Q So those exit criteria are developed by the
15 IEP team?

16 A Yes.

17 Q Are all of those criteria individualized?

18 A Yes, based on whether that student meets the
19 IEP goals, yes.

20 Q Are there any exit criteria that apply across
21 the board to all GNETS of Oconee students?

22 A In terms of their behaviors, what we recommend
23 is that they have a certain period of time on what we
24 call green level before they would be able to start
25 transitioning back to their home. So that's typically

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1 in our IEPs.

2 Q When you say that a student has a certain
3 period of time on a green level, what does being on a
4 green level mean?

5 A That would be in their class dojo which is a
6 computerized behavior management data collection
7 system. We recommend that 80 percent or above is green
8 level and that a student be able to maintain that
9 80 percent or above for six consecutive weeks.

10 Q Does the 80 percent or above refer to the
11 percentage of time that a student is behaving
12 appropriately?

13 A The positive behaviors that they are
14 displaying, yes.

15 Q Is there any sort of exit criteria applying
16 across the board that has to do with a student's
17 ability to successfully transition out into a general
18 education environment for some period of time?

19 A I'm not sure I understand the question.

20 Q Let me rephrase that. For students in GNETS
21 of Oconee, are there ever circumstances where students
22 have the ability to push out of in-class services into
23 a classroom and general education environment for some
24 period of time during the day?

25 A Yes, absolutely.

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1 Q So I guess I'm wondering whether there's any
2 sort of exit criteria for students that have to do with
3 their ability to do that, right; that they have shown
4 that they can push out into the general education
5 environment for one to three transition periods or
6 something along those lines. Is there any sort of
7 general criteria like that that applies?

8 A That's up to the IEP team to determine what
9 those individual student's needs are.

10 Q Moving over to the therapeutic support section
11 on this page, it notes here that, "GNETS of Oconee
12 works collaboratively with parents and community
13 agencies to support its students and help ensure each
14 student has what they need to be successful at school."

15 A Yes.

16 Q What agencies does GNETS of Oconee work
17 collaboratively with?

18 A The mental health centers, River Edge, Oconee
19 Center. There are some private providers in each of
20 our counties, Department of Family and Children's
21 Services, Department of Juvenile Justice. Each school
22 system or each county has an inner agency team that has
23 members come together on behalf of students in need.

24 Q So going back, you said that GNETS of Oconee
25 works collaboratively with River Edge.

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1 A (Indicating affirmatively.)

2 Q What does that collaboration look like?

3 A When we serve a mutual student, if we have a
4 release of information, we'll talk about that student's
5 progress, talk about what kind of medications they
6 have, if they are compliant with treatment, things like
7 that.

8 Q Does River Edge provide any services to
9 students on site at GNETS of Oconee?

10 A Occasionally.

11 Q Under what circumstances would that happen?

12 A General check-ins with students, that kind of
13 thing.

14 Q When you say occasionally, that's not sort of
15 a general practice?

16 A No.

17 Q You mentioned that there's also collaboration
18 with Oconee Center?

19 A Correct.

20 Q What is Oconee Center?

21 A Oconee Center is another mental health
22 facility serving the public.

23 Q Is that facility affiliated with a community
24 service board?

25 A I believe so.

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1 Q What does GNETS of Oconee's collaboration with
2 Oconee Center look like?

3 A Pretty much the same thing. Under release of
4 information, we'll talk to the counselor, the doctor,
5 about the progress of the student, things like that.

6 Q You referenced a release of information in
7 connection both with River Edge and Oconee Center. Are
8 you referring to an agreement by a student and his or
9 her parent or guardian that information that River Edge
10 or Oconee Center has can be communicated to GNETS of
11 Oconee?

12 A Yes.

13 Q You said there are also private providers in
14 the various counties that GNETS of Oconee collaborates
15 with?

16 A (Indicating affirmatively.)

17 Q How does GNETS of Oconee collaborate with
18 private providers?

19 A The same way.

20 Q Do private providers ever come in and deliver
21 on site services at GNETS of Oconee?

22 A Occasionally.

23 Q But that's not a general practice?

24 A It just depends on the student.

25 Q You mentioned also Division of Family and

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1 Child Services and then the Department of Juvenile
2 Justice. Does GNETS of Oconee collaborate with those
3 entities in terms of delivering therapeutic support or
4 services?

5 A Not really, no.

6 Q Is there communication between GNETS of Oconee
7 and those entities?

8 A Yes.

9 Q But it is not sort of, does it result in the
10 provision of any sort of therapeutic service per se?

11 A It depends, again, on the student. For
12 instance, a student in DFACS custody may contract with
13 a service provider to come in and work with students,
14 those kind of things.

15 Q I just want to be clear that DFACS and DJJ are
16 not actually providing therapeutic services or support,
17 there may be some third party that they are affiliated
18 with?

19 A Correct.

20 Q You mentioned that each county also has an
21 interagency team?

22 A Yes.

23 Q Tell me about those interagency teams.

24 A As indicated, there are different members of
25 the community, professional agencies that come together

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1 to discuss student cases that are really challenging
2 and in need of additional support, children in need of
3 services. And so they will provide recommendations to
4 the parent, basically.

5 Q Those interagency teams, when you say they
6 discuss student cases, are those GNETS student cases?

7 A Sometimes.

8 Q And sometimes those student cases may also
9 include other students who are in GNETS?

10 A Yes.

11 Q Who typically would be a participant in an
12 interagency team of the sort you are discussing?

13 A So a representative from Oconee Center, a
14 representative from River Edge, a representative from
15 DBHDD, which is the Department of Behavioral Health in
16 Georgia, Department of Juvenile Justice, Department of
17 Family and Children's Services, private providers, the
18 school system, GNETS. That's pretty much all that I
19 can think of.

20 Q How often do those interagency team meetings
21 occur?

22 A It varies, particularly before COVID it was
23 monthly, pretty regularly in each system, and that
24 hasn't been the case for the past couple years. So
25 there's only a couple systems that continue to meet

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1 monthly, Baldwin being one of them.

2 Q Is participation in the -- I guess my question
3 is, how did GNETS of Oconee become a participant in
4 these interagency teams?

5 A Because there are, sometimes our students are
6 being served and we have been invited to, particularly
7 because we are really familiar with the therapeutic
8 needs of kids and so we can help provide support as far
9 as that goes in schools.

10 Q Is that a decision that you as director made
11 on your own? I am kind of wondering how you first
12 became involved.

13 A The interagency teams invited us to become
14 involved.

15 Q Are those interagency teams led in any way by
16 anyone?

17 A There's a chair that runs it that rotates from
18 year to year, typically.

19 Q I assume the chair comes from someone who is a
20 member on the team?

21 A Yes.

22 Q Are there other therapeutic supports provided
23 to GNETS of Oconee students apart from any that may be
24 offered by community agencies?

25 A Can you give me an example?

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1 Q I am just wondering, so within GNETS of Oconee
2 itself, what kinds of therapeutic supports are provided
3 within the program?

4 A Okay, within the program, our students are
5 specialists, they are not titled as counselors. I've
6 got one, two people that are working toward licensure
7 in professional counseling and I have one licensed
8 clinical social worker. So they provide crisis
9 intervention, they provide group therapy, they provide
10 small social skills instruction, individual therapy,
11 those kind of things.

12 Q Do all GNETS of Oconee students receive group
13 therapy or some subset?

14 A Most of them do. It depends, if there's a
15 reason why the student can't, but generally yes.

16 Q Is there some sort of frequency with which
17 students receive group therapy?

18 A From the therapist, so we have it on a tiered
19 basis. So the Tier 1 pretty much receive the classroom
20 social skills instruction and practice, mindfulness
21 skills practice. But the Tier 2 and the 3 are more our
22 professional staff coming in to provide those services.

23 Q How frequently would a student who is on Tier
24 2 or Tier 3 receive group therapy if they were
25 receiving it?

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1 A Once a week, once every two weeks.

2 Q You mentioned social skills instruction and
3 practice and you said that students on Tier 1 receive
4 that?

5 A In the classroom level from the teacher and
6 the support teacher or paraprofessional.

7 Q Would Tier 1 include all students in GNETS of
8 Oconee?

9 A Yes.

10 Q Who delivers the social skills instruction and
11 practice?

12 A For the Tier 1, it's generally the teacher and
13 paraprofessional.

14 Q Is there a particular social skills curriculum
15 that GNETS of Oconee uses?

16 A We have used Skill Streaming. We also use
17 Ripple Effects which is an online social emotional
18 curriculum. It just depends on what the teacher is
19 comfortable with. Sometimes they are showing a class
20 dojo social skills intervention. It varies, basically.

21 Q How often is social skills instruction being
22 delivered to Tier 1 students?

23 A At least three times a week and then as needed
24 as situations arise.

25 Q I believe you also mentioned individual

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1 therapy?

2 A (Indicating affirmatively.)

3 Q Which GNETS of Oconee students would receive
4 individual therapy?

5 A Typically, the Tier 3 students and by
6 individual therapy, you know, they are short, brief.
7 It's not like an hour-long therapy session.

8 Q When you say short and brief, about how long
9 would an individual therapy session for a Tier 3 GNETS
10 student be?

11 A It depends on the situation and scenario.

12 Q How frequently do Tier 3 GNETS students who
13 receive individual therapy receive that therapy?

14 A It varies, but at least weekly.

15 Q Are there students who receive individual
16 therapy multiple times a week?

17 A Yes.

18 Q During last school year, about how many
19 students would you say fell into that category?

20 A Approximately 20.

21 Q Who provides the individual therapy for Tier 3
22 students?

23 A That's our licensed clinical social worker as
24 well as the two that are working towards their license
25 in professional counseling.

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1 Q Just so we are clear, you have talked a little
2 bit about Tier 1, Tier 2 and Tier 3. So the record is
3 clear, can you just explain generally how Tier 1, Tier
4 2 and Tier 3 operate?

5 A Sure. So Tier 1, I don't know if you are
6 familiar with positive behavioral supports and
7 interventions in the schools, 80 percent of the
8 students are able to follow rules and procedures and
9 generally without having extreme disciplinary problems
10 if that structure is in place. And so 80 percent
11 generally can follow without having that discipline,
12 writeups, things like that.

13 Tier 2 and Tier 3 are the more intensive
14 students. So the Tier 2 students are, you know,
15 anywhere from two to five disciplinary referrals in a
16 given year.

17 And then your top tier or Tier 3 are the more
18 intense students, six to ten or more disciplinary
19 referrals.

20 Q So when you refer to Tier 2 and Tier 3 GNETS
21 of Oconee students, you are talking about students who
22 have more intensive behavioral needs?

23 A Within the program, yes.

24 Q Any other therapeutic services or supports
25 provided by GNETS of Oconee apart from those that we

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1 have just discussed?

2 A We do have Georgia College and State
3 University music therapists to come in and work with
4 our students at some locations.

5 Q Which locations do the music therapists come
6 in and work at?

7 A Lakeview Academy, Oak Hill Middle School and
8 Baldwin High School and Wilkinson -- it just varies
9 because it's based on however many students can come
10 out. We have had them at Putnam as well. So it just
11 depends from semester to semester.

12 Q Where music therapists are coming out, how
13 frequently does that occur?

14 A Once or twice a week.

15 Q And would that be once or twice a week for an
16 entire school year?

17 A A semester.

18 Q When music therapists come out, do all
19 students enrolled in that particular GNETS of Oconee
20 location receive music therapy?

21 A It depends. In some cases, students don't
22 want to receive music therapy so it just depends. But
23 typically, yes.

24 Q Any other therapeutic services and supports
25 from GNETS of Oconee that we haven't talked about?

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1 A Right now, we do have Benchmark Services come
2 in that we're contracting with. Is that what we are
3 talking about here?

4 Q Yes, I am happy to hear about that too.

5 A Benchmark, they have BCBAs coming in, RBT. We
6 contract with them to come in and work with our
7 students in Baldwin County and we also contract with
8 Pure Heart Behavioral and they are serving students in
9 Wilkinson County right now.

10 Q For BCBA and RBT from Benchmark, you said
11 those folks are coming out to Baldwin County?

12 A (Indicating affirmatively.)

13 Q How many GNETS of Oconee students are
14 receiving services through Benchmark approximately?

15 A They provide classroom support as well as
16 individual in some cases, so it's hard to say.

17 Q How frequently does Benchmark come out to the
18 Baldwin County sites?

19 A About twice a week per site.

20 Q When they come out, do they stay for the
21 entire school day?

22 A About half a day, couple hours.

23 Q For Pure Heart which I believe you said
24 supports Wilkinson County?

25 A (Indicating affirmatively.)

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1 Q Are they functioning in a similar capacity to
2 Benchmark in that they are supporting classrooms and
3 some individual students as well?

4 A Yes.

5 Q How often does Pure Heart come out?

6 A Approximately one day a week. It's about a
7 day a week.

8 Q When they come out, do they stay for an entire
9 school day?

10 A Approximately four or five hours.

11 Q When Benchmark comes out, are they sending
12 enough people to support each classroom within Baldwin
13 County?

14 A They rotate through, so yes, they are
15 supporting all the classrooms in Baldwin County, all
16 our GNETS classrooms.

17 Q But it is not a one-to-one ratio in terms of
18 sending someone to each dedicated classroom?

19 A No.

20 Q Does the same kind of rotation happen with
21 Pure Heart?

22 A There's one elementary classroom that they are
23 working with right now, so.

24 Q Any other therapeutic services or supports
25 that we haven't talked about yet?

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1 A I can't think of any others.

2 Q Turning to Page 3, there's a discussion of
3 academic services. If you look at the top of the page,
4 it says, "K-8 students work in iReady and Moby Max in
5 addition to engaging instruction by their GNETS
6 teacher."

7 Do you see that?

8 A Yes.

9 Q What is iReady?

10 A IReady is a reading and math intervention
11 program.

12 Q Is there some sort of a license required to
13 access iReady?

14 A Yes, we purchase the licenses from iReady.

15 Q Who pays for those licenses?

16 A Our GNETS budgets.

17 Q How often is iReady used within GNETS of
18 Oconee?

19 A Typically, each subject, reading and math,
20 it's recommended 90 minutes per week per subject.

21 Q Where does that 90-minute figure come from?

22 A That was the recommendation from the iReady
23 Curriculum Associates people.

24 Q Is there any sort of minimum usage of iReady
25 that is required of GNETS of Oconee?

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1 A Typically, we say 15 minutes a day per
2 subject.

3 Q Is that something that you as director have as
4 an internal standard or how did that come to be?

5 A I don't remember. I'm pretty sure it was
6 something that we came up with with Curriculum
7 Associates.

8 Q What is Moby Max?

9 A Moby Max is an online curriculum as well and
10 it covers all subjects, science, social studies,
11 reading and math.

12 Q Is there a license required to access Moby
13 Max?

14 A Yes.

15 Q Who pays for that license?

16 A We do, GNETS.

17 Q How often is Moby Max used?

18 A It varies, but typically teachers are
19 utilizing that as part of their instruction in the
20 classroom so it just varies. There's no guideline on
21 that.

22 Q So no minimum usage required for that?

23 A No.

24 Q It says, "K-8 students also have engaging
25 instruction by their GNETS teacher."

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1 A Yes.

2 Q Do you have a sense for what percentage of a
3 K-8 GNETS of Oconee student's day is directed from a
4 GNETS teacher versus some of the online platforms you
5 discussed?

6 A It's really hard to say. It varies per
7 teacher and per grade level so I would say in my
8 younger classes, there's more direct instruction than
9 in a middle or high school because those students are
10 more independent.

11 Q Moving down, since you mentioned older
12 students, in the second paragraph from the bottom it
13 says, "Our high school curriculum uses online software
14 to provide standard space curriculum using the Georgia
15 Standards of Excellence."

16 Do you see that?

17 A Yes.

18 Q Are the platforms or the online software, I
19 should say, referred to in this statement, those that
20 appear in this section, Grad Point, Odysseyware and
21 Edgenuity?

22 A Yes, typically, Edgenuity.

23 Q Are those platforms also used for middle
24 school curriculum?

25 A Yes.

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1 Q Are there any other platforms used apart from
2 those three?

3 A Again, it varies because there's different
4 programs that each local school system purchases, Read
5 180, Fast Math, different programs. So it's different
6 by site. Those aren't purchased by GNETS.

7 Q Who purchases those?

8 A The local school system. So our kids have
9 access to whatever the local school system kids have
10 access to.

11 Q Do middle school students at GNETS of Oconee
12 receive direct standards-based instruction from GNETS
13 teachers?

14 A Yes.

15 Q Is there any sort of rough breakdown of how
16 much of their time is direct instruction versus online
17 platforms?

18 A It varies, but I would say most of it is the
19 online platform with the support of direct instruction
20 from the teachers, so probably my guess would be
21 30 percent direct instruction.

22 Q And then 70 versus, whichever the program is,
23 Grad Point, Odysseyware, Edgenuity?

24 A Correct.

25 Q What about for high school students?

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1 A Typically, with high school students, they are
2 almost solely using the online program with support.
3 So the teacher will take a lesson from Edgenuity and do
4 it as a group, those kind of things.

5 MS. GARDNER: I'd like to have the court
6 reporter mark this document as Plaintiff's
7 Exhibit 469.

8 (Plaintiff's Exhibit 469 was marked for
9 identification.)

10 (Witness reviewing document.)

11 BY MS. GARDNER:

12 Q Ms. Wolf, you have been handed what's been
13 marked as Plaintiff's Exhibit 469. This is an email
14 thread, the most recent email from you to Vickie
15 Cleveland dated September 12, 2019 with the subject
16 "Forward: Funding Ratios," and one attachment that is
17 an Excel spreadsheet with the file name FY20 GNETS of
18 Oconee Funding Ratios as of 9419. This document is
19 Bates stamped GA00952013.

20 Do you recognize this document?

21 (Witness reviewing document.)

22 A I do.

23 Q Am I correct that you sent the Excel
24 spreadsheet attached to this email to Vickie Cleveland
25 in response to a request for information from her; is

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1 that right?

2 A Correct.

3 Q That request was that you provide a
4 spreadsheet showing the number of support staff,
5 teachers and paraprofessionals who are paid with the
6 GNETS state or Federal grant?

7 A Correct.

8 Q She also requested that you indicate whether
9 your social worker is certified as an MSW or LCSW?

10 A Correct.

11 Q Turning to the spreadsheet which appears at
12 the end of this document, does this outline the
13 information that Ms. Cleveland requested as it relates
14 to GNETS of Oconee?

15 A Yes.

16 Q This spreadsheet serves one support staff
17 which is your LCSW that is funded by the State grant
18 and one administrative assistant funded by the Federal
19 grant; is that correct?

20 A Correct.

21 Q Do you still have an LCSW funded by the State
22 grant?

23 A Yes.

24 Q Just one?

25 A Yes.

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1 Q Do you still have an admin assistant funded by
2 the Federal grant?

3 A Yes.

4 Q Just one?

5 A Yes.

6 Q Do you currently have any other support staff
7 apart from those two funded by the State or Federal
8 grant?

9 A The contracted licensed professional
10 counselor, and that's indicated under there, Number of
11 behavior coaches.

12 Q At the time of this spreadsheet, did you have
13 any support staff funded by any of the LEAs that GNETS
14 of Oconee serves?

15 A No.

16 Q Do you have any support staff funded by those
17 LEAs currently?

18 A No.

19 Q This chart also shows how many teachers you
20 had who were funded by the State or Federal grant,
21 correct?

22 A Yes.

23 Q This shows ten teachers total?

24 A That's correct.

25 Q All of those teachers were funded by the State

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1 grant; is that right?

2 A Yes.

3 Q Did you have any teachers at the time this
4 information was submitted who were funded by the LEAs
5 that GNETS of Oconee serves?

6 A No.

7 Q Do you currently have any teachers funded by
8 those LEAs?

9 A No.

10 Q Do you still have ten teachers total?

11 A Yes.

12 Q Are all ten still funded by the State grant?

13 A Yes.

14 Q Finally, this chart shows how many
15 paraprofessionals you had that were funded by the State
16 or Federal grant, right?

17 A Yes.

18 Q The chart shows twelve paraprofessionals
19 total; is that correct?

20 A Correct.

21 Q Nine of those were funded by the Federal grant
22 and three were funded by the State grant?

23 A Yes.

24 Q At the time you submitted this information,
25 did you have any paraprofessionals who were funded by

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1 the LEAs that GNETS of Oconee serves?

2 A No.

3 Q Do you currently have any paraprofessionals
4 who are funded by those LEAs?

5 A No.

6 Q Do you still have twelve paraprofessionals?

7 A I think we have 13 paraprofessionals now in
8 this staffing pattern, but then, like we talked about
9 earlier, the vacancies.

10 Q I believe you said you have five or six
11 vacancies; is that correct?

12 A Yes.

13 Q Is the breakdown roughly the same in terms of
14 the number of your paraprofessionals whose funding
15 comes from the State grant relative to the Federal
16 grant?

17 A It is.

18 Q What about your profession as director, it is
19 not listed in this chart. How is your position funded?

20 A My position is funded through the State grant.

21 MS. GARDNER: I'd like to have the court
22 reporter mark this document as Plaintiff's
23 Exhibit 470.

24 (Plaintiff's Exhibit 470 was marked for
25 identification.)

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1 (Witness reviewing document.)

2 BY MS. GARDNER:

3 Q Ms. Wolf, you have been handed what's been
4 marked as Plaintiff's Exhibit 470. This is a
5 non-Bates-stamped document. At the top of the document
6 it says Grants Information, Fiscal Year 2022, System
7 Name, 866 - Oconee RESA; name, GNETS; status, program
8 manager, signed off. Do you recognize this document?

9 A I do.

10 Q What is this document?

11 A This is our grant proposal.

12 Q Is this the grant proposal for GNETS of Oconee
13 for fiscal year '22?

14 A It is.

15 Q I'd like to direct your attention to Page 4 of
16 this document, the fourth page in. At the top it says
17 staffing pattern. Do you see that?

18 A I do.

19 Q We just discussed this, but correct that this
20 reflects the discussion that there are no staff
21 positions at GNETS of Oconee for FY22 funded by the
22 LEAs?

23 A Correct.

24 Q This indicates that there are 15 staff
25 positions at GNETS of Oconee funded by the State grant;

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1 is that right?

2 A Correct.

3 Q And that there are four staff positions funded
4 by the Federal grant?

5 A Correct.

6 Q If you then look at the 7th page from the
7 back. I'm sorry, these pages are also not numbered.

8 A Okay.

9 Q Do you see the section that says Service
10 Delivery Supplemental Instruction?

11 A Yes.

12 Q If you flip over one more page from that to
13 the second page of that section, there's a question in
14 the middle of this page, it says, "How is academic data
15 being used by leadership to support students, staff and
16 parents?"

17 Do you see that question?

18 A Yes.

19 Q Towards the end of the first sentence there it
20 says, "Data is analyzed for progress on IEP goals as
21 well as progress in academic grade level standards."

22 Do you see that?

23 A I'm not sure where you are -- yes, okay.

24 Q How does GNETS of Oconee ensure that the
25 curriculum is aligned both with general education grade

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1 level standards and a student's IEP?

2 A The IEP team really looks at both together.
3 The programs that we used are aligned with the Georgia
4 Standards of Excellence curriculum and so there's
5 alignments built into the program that you can see and
6 determine which standards those students have met. And
7 for the IEP we use a progress monitoring tool that
8 teachers will regularly progress monitor those IEP
9 goals.

10 Am I answering your question?

11 Q Yes, I think so. When you say that there is a
12 progress monitoring tool that teachers use, is there a
13 name for that tool?

14 A It is just IEP progress monitoring.

15 Q So is that just more of a practice?

16 A It is an in-house tool that we use where
17 teachers will progress monitor those IEP goals.

18 Q When you say tool, is there a form that
19 teachers fill out?

20 A Yes.

21 Q How frequently is that done?

22 A We encourage weekly, but not all teachers get
23 progress monitoring done weekly. At least biweekly.

24 Q Do you have an example of what it might look
25 like at GNETS of Oconee for a student to receive grade

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1 level standards but to still have their IEP
2 incorporated into that? I am just trying to understand
3 sort of how that works.

4 A So students that might be on a, working, for
5 example, working in Edgenuity, they are working on
6 their high school curriculum and the Georgia Standards
7 of Excellence. However, they may have reading needs
8 and would need to practice sight words and things like
9 that. So that may be their IEP goal and that's
10 progress monitored.

11 But they are also working in the Edgenuity
12 program working through the course work required for
13 the high school graduation.

14 Q One other question on this document. The last
15 question on this page says or prompt says, "Describe
16 the procedures used to ensure supplemental academic
17 interventions or implement it with Fidelity."

18 Do you see that?

19 A Yes.

20 Q Beneath that, "The iReady instructional usage
21 data is reviewed and shared at least every two weeks."

22 A Correct.

23 Q "Teachers are required to hold weekly meetings
24 with students to ensure instructional usage is met as
25 well as passing scores of 80 or above."

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1 Do you see that?

2 A Yes.

3 Q What does it mean to have a passing score on
4 iReady?

5 A That means that, so there are various lessons
6 that are within iReady. Every lesson has a score
7 attached to it so that would be the passing score,
8 whatever the score is.

9 Q That score is a reflection of a student's
10 mastery of whatever the standards are in that
11 particular section of the iReady?

12 A That's correct.

13 MS. GARDNER: I will ask the court reporter to
14 mark this document as Plaintiff's Exhibit 471.

15 (Plaintiff's Exhibit 471 was marked for
16 identification.)

17 (Witness reviewing document.)

18 BY MS. GARDNER:

19 Q Ms. Wolf, you have been handed what's been
20 marked as Plaintiff's Exhibit 471. This is a document
21 whose first page is captioned, Board Update for 8-10-21
22 RESA Board of Control Meeting.

23 Do you recognize this document?

24 (Witness reviewing document.)

25 A Yes, I do.

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1 Q What is this document?

2 A This is a document that I use to show the
3 staffing pattern and the number of students at each
4 site for the RESA Board of Control.

5 Q Is this one of the written updates you
6 referenced earlier that you prepare for the Board of
7 Control?

8 A It's part of it, yes.

9 Q The first page of this document shows the
10 number of GNETS students served; is that correct?

11 A Correct.

12 Q We talked a little bit earlier about the
13 differences between cumulative count and in the-class
14 count?

15 A Yes.

16 Q That applies to this as well?

17 A Yes.

18 Q Turning to the second page, am I correct that
19 this page summarizes GNETS of Oconee staff as of
20 August 9, 2021?

21 A Yes.

22 Q That shows you had 11 teacher positions?

23 A Yes.

24 Q And eight of those were filled at the time?

25 A Yes.

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1 Q This chart shows a vacancy at Lakeview Academy
2 for grades 3 through 4?

3 A Yes.

4 Q How did you handle that vacancy?

5 A With a paraprofessional sub until that vacancy
6 was filled, with one of our paraprofessionals.

7 Q How long did it take to fill that vacancy?

8 A I believe that one was filled relatively
9 quickly. Actually, no, as I'm looking at it, that was
10 one of the classes that we had to move around a little
11 bit. We dissolved that classroom, I believe.

12 Q What happened to the four students who were in
13 that classroom?

14 A I'm not really sure if they were divided up
15 between the two or whether we had a student move out.

16 Yes, okay, as I'm looking at it, the classroom
17 at the Putnam Primary School, we had two students move
18 out of the county and one of the students transitioned
19 back full-time, so Ms. Coleman went down to Lakeview
20 Academy and became the teacher there.

21 Q When in the year did Ms. Coleman move to
22 Lakeview Academy?

23 A It was the beginning of last year, the
24 beginning of FY22.

25 Q This says you also had another teacher vacancy

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1 in Washington County. Do you see that?

2 A Yes.

3 Q That county also had a vacant support teacher
4 spot; is that right?

5 A Are we talking about Hancock County?

6 Q No, Washington County which is all the way at
7 the bottom.

8 A Washington County, yes.

9 Q It shows vacancies for both the teacher
10 position and the support teacher position.

11 A Yes.

12 Q How did GNETS of Oconee service the three
13 students in that Washington County classroom, given
14 those vacancies?

15 A So some of their students went to the Johnson
16 County classroom and were served in that class and some
17 of the younger students were served in the Wilkinson
18 County classroom.

19 Q So some students were moved to Johnson County,
20 you said?

21 A Correct.

22 Q The remainder were served in Wilkinson County?

23 A Yes.

24 Q This chart says that there's three teacher
25 vacancies and I only see two here. Is there another

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1 vacancy?

2 A Yes, it looks to me like there's only two.
3 See where it says, "Lauren Hodnett, pending board
4 approval," that was considered a vacancy because it
5 wasn't approved yet. That's the way I wrote that.

6 Q Understood. So on this page Lauren had you
7 had net is identified as a teacher. If you turn to the
8 next page, it looks like she shows up as a support
9 teacher during the prior spring?

10 A Yes.

11 Q Did she move from a support teacher role to a
12 full teacher role?

13 A Yes, she obtained her bachelor's and then
14 entered the TAPP program.

15 Q What is the TAPP program?

16 A The Teacher Alternative Preparation, I'm not
17 sure what the other P is.

18 Q Functionally, what is the TAPP program?

19 A The TAPP program is a teacher certification
20 program wherein one teacher has attended for a year or
21 two years. Under Oconee RESA, they can become
22 certified in the field and content area.

23 Q Do you have any other teachers at GNETS of
24 Oconee in the TAPP program apart from Ms. Hodnett?

25 A Presently, I have Ms. Hodnett, Mr. Derrick

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1 Harris, he's our now Washington County teacher, and I'm
2 trying to think if there's any others. I think that is
3 it right now.

4 Q What educational background and credentials
5 are GNETS of Oconee teachers required to have?

6 A They are required to be able to be certified
7 as teachers. In our program, and I believe in all the
8 GNETS programs, it's difficult to get somebody with the
9 ideal special education background as well as content
10 certified background.

11 We get people coming out of fields, like they
12 are coming from a psychology background to work with
13 this population. It's required that they are going to
14 be able to be certified.

15 Q Are GNETS of Oconee teachers required to be
16 certified in special education?

17 A Yes.

18 Q Are all of the GNETS of Oconee teachers
19 currently certified in special education?

20 A Yes.

21 Q This TAPP program provides a certification in
22 special education?

23 A Yes, as well as content areas.

24 Q But it is just an alternative certification
25 pathway, is that how it works?

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1 A Yes.

2 Q On this page it shows that you had 13 support
3 teachers positions, right?

4 A Yes.

5 Q And ten of them were filled; is that correct?

6 A Yes.

7 Q The teacher support position, is that the same
8 as a paraprofessional position?

9 A Yes.

10 Q How do you handle support teacher vacancies?

11 A It varies. We contract with ESS which, I
12 don't know what the acronym stands for, but it is a
13 program that provides certified subs, substitutes. And
14 so we work closely with them to provide the service.

15 Q Under Other Certified Staff, if you look
16 towards the bottom of this page, it identifies an
17 executive secretary and then under Qualifications it
18 says, "certified substitute, two days as secretary,
19 three days as substitute."

20 A Correct.

21 Q What does that mean?

22 A So she provided secretarial services two days
23 and then she would provide the rest in a classroom as a
24 substitute. She was a certified paraprofessional.

25 Q Moving on to the section that says GNETS

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1 Mental Health Clinicians.

2 A Yes.

3 Q It says you have a treatment coordinator; is
4 that right?

5 A Yes.

6 Q That person is a licensed clinical social
7 worker?

8 A Yes.

9 Q Is that one of the social work positions
10 reimbursed by the therapeutic services grant you
11 referenced earlier?

12 A Yes.

13 Q This also says you have a student support
14 specialist at Lakeview Academy, right?

15 A That's correct.

16 Q That person has a master's in professional
17 counseling?

18 A Yes.

19 Q It says that they are eligible for licensure
20 as a licensed professional counselor, but I take it
21 that they are not actually licensed?

22 A That's correct, she hasn't taken the test.

23 Q Is that position covered by any sort of
24 therapeutic services grant?

25 A No.

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1 Q Then at the bottom it says that there is a
2 student support specialist at Oak Hill Middle School
3 and it says that that position is contractual. Do you
4 see that?

5 A That's correct, yes.

6 Q Is this position covered by any sort of
7 therapeutic services grant?

8 A No.

9 Q I am going to share a document electronically
10 with you. Can you see this document?

11 A Yes.

12 Q This is a document that was produced natively
13 to us by GNETS of Oconee. The file name on the
14 document is Oconee_temp_042177 and as you can see from
15 the spreadsheet, this is FY22 GNETS of Oconee
16 Professionally Qualified Status All Staff.

17 Do you recognize this document?

18 (Pause.)

19 A Yes.

20 Q Is this a list of your staff at GNETS of
21 Oconee for FY22?

22 A Yes.

23 Q Am I correct that there are separate tabs that
24 identify staff for prior fiscal years?

25 A Yes.

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1 Q Is this list for FY22 still accurate
2 currently?

3 A No.

4 Q What is different?

5 A Mr. Clyde and Ms. Coleman, Ms. Hardy, there's
6 a couple staff that have left. One retired.

7 Q I know you said Mr. Harvey has left. I am
8 wondering if you look at the entry for him for FY22, it
9 references a waiver.

10 Do you see that?

11 A Yes.

12 Q What does that mean?

13 A So it was Mr. Clyde that I said left, not Mr.
14 Harvey, but Mr. Harvey, he was with us last year and
15 then retired. He did not -- he was under a different
16 program where he was seeking certification that he
17 never fulfilled. So it was expiring. So we had to
18 request a waiver.

19 So that's what that is. So his certificate
20 was approved on waiver to June of two thousand, I
21 believe it was, '22 is when they renewed it to.

22 MS. GARDNER: I think I neglected to ask that
23 this document be marked as Plaintiff's Exhibit 472.

24 (Plaintiff's Exhibit 472 was deemed marked for
25 identification.)

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1 BY MS. GARDNER:

2 Q Ms. Wolf, do you see an entry for Mr. Clyde,
3 there is a reference to IN4T?

4 A Yes.

5 Q Is that any sort of alternative certification
6 indicator? What is the significance of IN4T?

7 A It is. That's when they get certified and
8 they are initially getting through the TAPP program, we
9 apply for that certificate until they meet the
10 requirements and then they would, the INT4 (sic) would
11 come off.

12 Q So the IN4T is an indicator of participation
13 in the TAPP program?

14 A Any inductive program. It could be that they
15 are pursuing an induction certificate through a
16 college.

17 Q I just have one more question, a couple more
18 questions on this document. What is the difference
19 between -- do you see this? I have turned to the tab
20 that is FY19 staff?

21 A Yes.

22 Q What is the difference between a certification
23 Level 4, 5 and 6?

24 A Okay, the 4 is a bachelor's level, 5 master's,
25 6 specialist.

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1 Q Thank you. What is the process for hiring
2 personnel when you have a vacancy or some other need as
3 identified?

4 A I'm not sure what your question is, like in
5 terms of recruitment or --

6 Q I am trying to understand how the hiring
7 process works at GNETS of Oconee when you need to use
8 it.

9 A Okay, when there's a vacancy, we advertise the
10 position and candidates will apply for the position.
11 We choose the best candidate, interview, get their
12 references, get three references back, get their
13 college transcripts.

14 And then once I select that candidate for
15 approval, I'll submit that to the board with their
16 documentation and the reason for recommending them.
17 And then they have their fingerprints, their background
18 check done. And that's the procedure.

19 Q You mentioned there is an interview process.
20 Who typically participates in the interview?

21 A Typically, I interview them.

22 Q You said you submit candidates that you have
23 approved to the board, referring to the RESA Board of
24 Control?

25 A That's correct.

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1 MS. GARDNER: I think we have been going for
2 more than an hour at this point. Would y'all like
3 to take another break?

4 MR. NGUYEN: Yes.

5 THE VIDEOGRAPHER: We are off the record at
6 12:15 p.m.

7 (Luncheon recess.)
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AFTERNOON SESSION.

1:21 p.m.

THE VIDEOGRAPHER: We are back on the record

at 1:21 p.m.

BY MS. GARDNER:

Q Welcome back.

A Thank you.

(Plaintiff's Exhibit 473 was deemed marked for
identification.)

Q I want to show you another electronic document
that I am going to be ask be marked as Plaintiff's
Exhibit 473.

Do you see this document, Ms. Wolf?

(Pause.)

A I do.

Q This is a document, the caption is Board
Update for 7-9-19 RESA Board of Control Meeting.

Do you recognize this document?

A Yes, I do.

Q Is this another of the written updates that
you provide the RESA board on a periodic basis?

A Yes.

Q I want to direct your attention to the bottom
of the document of the first page that says Staffing
Pattern Summary and Consideration.

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1 Do you see that section?

2 A Yes.

3 Q If you look at the very bottom bullet point it
4 says, "The contracted mental health position will not
5 be filled due to budget deficit."

6 Do you see that?

7 A Yes.

8 Q What contracted mental health position is this
9 referring to?

10 A I'm not sure what that's referring to. I
11 think that we just didn't have the funds at that time
12 too. That was maybe before the therapeutic services
13 grant came and we weren't able to fund that contracted
14 position without that.

15 Q But you are not sure what the actual position,
16 whether it was for a licensed clinical social worker or
17 something else?

18 A It was for, it would have been for the LPC
19 that's seeking licensure.

20 Q Just above that, it says, "LVA 1 to 3 students
21 are on half day schedules due to various student
22 behaviors. We may need to move to a half day model to
23 accommodate large numbers/severity of student
24 behaviors."

25 Do you see that?

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1 A Yes.

2 Q Is LVA a reference to Lakeview Academy?

3 A Yes, it is.

4 Q Can you explain your statement, "We may need
5 to move to a half day model to accommodate large
6 numbers/severity of student behaviors"?

7 A Yes, because of the safety of the students and
8 many of them were very physically aggressive. At the
9 time there were, I want to say, eight students in each
10 class. It was too many. They were very physically
11 aggressive.

12 Kids were hurting each other, climbing on
13 furniture, et cetera, and it was not a safe issue and
14 we felt we should see if we can start them on half day
15 models.

16 Q You were saying that there may need to --
17 Lakeview Academy might need to move to a half day model
18 for all students?

19 A The GNETS class, yes.

20 Q Did Lakeview move to a half day model for all
21 students?

22 A That particular year, yes, but then we just
23 started visiting it on a case-by-case basis for other
24 students. So some students are now on full day basis
25 and others are on half day.

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1 Q What percentage of Lakeview Academy students
2 roughly would you say are on half day currently?

3 A I would say about 70 percent.

4 Q Is the idea with half day that you are
5 alternating students so some students are coming in the
6 morning and then a different set of students are coming
7 in the afternoon so you thin out the numbers in each
8 classroom?

9 A That's correct.

10 Q Is the need for a half day model influenced by
11 budget considerations?

12 A Only in that another class, our budget
13 couldn't manage an additional class plus we didn't have
14 the staff. So there were a lot of factors. But the
15 half day model was because of safety and severity of
16 the kids.

17 Q If you could have an additional class with
18 staff, would you be able to serve those students for a
19 full day?

20 A Possibly.

21 Q On this document in the chart that's in the
22 center of the document on the far right it says
23 therapeutic staff. There's a column for that. Do you
24 see that?

25 A Yes.

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1 Q Is this outlining the schedule that your
2 therapeutic staff members follow in terms of the number
3 of days per week that they spend at various sites?

4 A In 2019 it was, yes.

5 Q This would have been for the 2019-2020 school
6 year?

7 A For that school year, yes.

8 Q Just so I understand this, if you see where it
9 says Hancock Central Middle High?

10 A Yes.

11 Q And the therapeutic staff says Brundage?

12 A Yes.

13 Q Is that person based there? It doesn't have a
14 particular number of days per week.

15 A That would have been one day per week.

16 Q We have talked a little bit about some of the
17 therapeutic aspects of GNETS of Oconee. I want to
18 continue with that a bit.

19 MS. GARDNER: I am going to ask the court
20 reporter to please mark this document as
21 Plaintiff's Exhibit 474.

22 (Plaintiff's Exhibit 474 was marked for
23 identification.)

24 (Witness reviewing document.)

25 BY MS. GARDNER:

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1 Q Ms. Wolf, you have been handed what's been
2 marked as Plaintiff's Exhibit 474. This is an email
3 thread, the most recent email here is from you to
4 Vickie Cleveland dated April 30, 2018. The subject
5 line is Re: Open Records request. And the first page
6 of this document is Bates stamped GA00320205. Do you
7 recognize this?

8 A Yes.

9 Q Is it accurate that this email responds to an
10 earlier email from Vickie Cleveland to the GNETS
11 directors requesting that "each GNETS program provide a
12 list of all services, curricular and behavioral
13 interventions being provided to students enrolled at
14 the GNETS program site"?

15 A Yes.

16 Q So turning to your email, your email contains
17 the list of services that you are providing in response
18 to that request, correct?

19 A Correct.

20 Q Ms. Cleveland made this request because she
21 received an Open Records request from the Georgia
22 Advocacy Office regarding specific services being
23 provided to GNETS students; is that correct?

24 A Correct.

25 Q In your list, you separate the services into

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1 curricular interventions and behavioral and therapeutic
2 interventions, correct?

3 A Correct.

4 Q Are the curricular interventions listed here
5 still accurate today?

6 A No.

7 Q What modifications were there?

8 A Curricular, so Baldwin, Oak Hill and High
9 School now use Edgenuity. Moby Max also uses
10 Edgenuity.

11 Q You said Moby Max uses --

12 A I'm sorry, Wilkinson uses Edgenuity for middle
13 and high school and Wilkinson uses Moby Max for
14 elementary. Edgenuity is used for Wilkinson County.

15 Q Is anyone using Grad Point?

16 A No one uses Grad Point anymore.

17 Q Is anyone using Odysseyware?

18 A I think Edgenuity is an offshoot of
19 Odysseyware, so it's still Edgenuity now.

20 Q Is it still accurate that all programs except
21 for iReady are paid by LEA in-kind services?

22 A That is correct.

23 Q Moving to the behavioral and therapeutic
24 interventions, is this list still accurate today?

25 A Yes.

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1 Q We have talked about some of these
2 interventions already. I did want to ask about the
3 dialectical behavior therapy. Is that provided as an
4 individual therapy?

5 A Yes.

6 Q So that would be under the umbrella of
7 individual therapy services that we discussed earlier?

8 A Yes, but part of dialectical behavior therapy
9 is using the mindfulness piece so in that respect it is
10 sometimes done in groups.

11 Q So it would be either group or individual
12 therapy?

13 A Yes.

14 MS. GARDNER: I'd like the court reporter to
15 please mark this document as Plaintiff's
16 Exhibit 475.

17 (Plaintiff's Exhibit 475 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q Ms. Wolf, you have been handed what has been
22 marked as Plaintiff's Exhibit 475. This is an email
23 from you to Vickie Cleveland dated May 14, 2018. The
24 subject is Re: Interventions.

25 The email contains one attachment which is a

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1 Word document with the file name Ocone Services, and
2 the first page of this document is Bates stamped
3 GA00321938.

4 Do you recognize this document?

5 A Yes.

6 Q Looking at the attachment that you provide in
7 your email to Ms. Cleveland which appears at the end of
8 this document, is this an expanded version of the
9 services that we reviewed in the prior email?

10 A Yes.

11 Q This is in response to the same request from
12 Ms. Cleveland?

13 A Yes.

14 Q I just want to look at the behavioral and
15 therapeutic services that were not included in the
16 prior email. If you look at the bottom half of the
17 attachment, do you see where it says Love and Logic?

18 A Yes.

19 Q What is Love and Logic?

20 A Love and Logic is an intervention program,
21 it's a way to interact with kids in a positive way
22 where you are building the relationships and holding
23 them accountable and it is a program that I train all
24 teachers in.

25 Q Your teachers currently are all trained in

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1 Love and Logic?

2 A Some of the new ones are not.

3 Q How often do you deliver the Love and Logic
4 training?

5 A Try to deliver it once a year.

6 Q That has not been delivered yet this year?

7 A No.

8 Q Do you have plans to deliver it?

9 A I will most likely deliver parts of it. They
10 have access to the information and the professional
11 learning but I don't know that I'll deliver it. It
12 just depends on what the need is.

13 Q Then if you look down below that it says, "CPS
14 (collaborative and proactive solutions model)"?

15 A Yes.

16 Q What is that?

17 A So that model is where, it's a model where you
18 are actually assessing the lagging skills that kids
19 have. As opposed to looking at it from a disciplinary
20 problem, you are looking at it from a skills deficit
21 problem.

22 And so I trained all staff in that. And it's
23 Ross Green's model. Basically, you are looking at what
24 the lacking skills are and how you can provide
25 education and training so they can learn those skills.

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1 Q This says the provider for that is licensed
2 counseling staff, so when you say you train staff in
3 that, is it the counseling staff or all of your staff
4 trained in that?

5 A I trained all of my staff. I trained them in
6 the summer, I believe, of 2019 or '20, trained
7 everyone. But yes, the way the forms are set up, I
8 felt like my licensed staff would be the ones that
9 actually initiate those meetings with the parents and
10 the students and the teachers.

11 Q Is it fair to say that all of the behavioral
12 and therapeutic services listed here either have no
13 cost associated with them or are paid for through the
14 GNETS state grant?

15 A That is correct.

16 Q Does that continue to be true today?

17 A Yes, all of it. The PBIS, the Georgia
18 Department of Education does PBIS trainings which we
19 deliver, but everything else is through our grant.

20 MS. GARDNER: I would like to have this
21 document marked as Plaintiff's Exhibit 476.

22 (Plaintiff's Exhibit 476 was marked for
23 identification.)

24 (Witness reviewing document.)

25 BY MS. GARDNER:

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1 Q Ms. Wolf, you have been handed what's been
2 marked as Plaintiff's Exhibit 476. This is an email
3 thread between you and Nakeba Rahming. The most recent
4 email is from you to Nakeba Rahming dated September 29,
5 2017. The subject is "Re: Needs Statement," and the
6 email has one attachment which is a pdf with the file
7 name "Oconee GNETS Needs Statement for Support with
8 Temporary Therapeutic Staff Services." This document
9 has a Bates stamp GA00794101.

10 Do you recognize this document?

11 A Yes.

12 Q In this email, you transmit the attachment
13 that I just referenced to Ms. Rahming; is that right?

14 A Yes.

15 Q Who is Nakeba Rahming?

16 A She was the prior program manager for GNETS.

17 Q She was employed by the Georgia Department of
18 Education?

19 A Correct.

20 Q I want to take a look at the attachment which
21 is the last two pages of this document. Would you
22 explain what this needs statement for support with
23 temporary therapeutic staff services is?

24 A I don't remember the reasons that she asked us
25 to send this. I think they were seeing a need

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1 statewide with our GNETS programs in terms of
2 therapeutic support. In our case, it was my opinion
3 that we did need more therapeutic support staff.

4 Q So am I correct that this needs statement goes
5 into more detail about your need for therapeutic
6 support staff?

7 A Yes.

8 Q In completing this needs statement, was there
9 any particular goal or were you completing it in order
10 to receive something?

11 A I believe we completed it in order to seek
12 therapeutic services funding through the State.

13 Q So looking at the top of this document, do you
14 see where it says, "What is the problem?"

15 A Yes.

16 Q It says here that, "Therapeutic staff at GNETS
17 of Oconee is inadequate because our classrooms are
18 spread out into twelve different classes at six
19 locations across each of the systems we serve."

20 Do you see that?

21 A Yes.

22 Q Then it goes on to say, "When a crisis occurs,
23 the teacher and support teacher are the only ones on
24 site to intervene. Additional therapeutic support is
25 needed for Life Space Crisis Intervention, group and

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1 individual therapy."

2 Do you see that?

3 A Yes.

4 Q So at the time you completed this document in
5 2017, the only people available to support GNETS of
6 Oconee students in crisis were the teacher and support
7 teacher on site?

8 A Unless that was a day that our therapeutic
9 staff was scheduled to be there. So we did have a
10 rotating schedule, but if a crisis occurred at one
11 place, there may or may not be a mental health person
12 to help deal with that crisis.

13 Q So at this time your therapeutic staff were
14 rotating but there was not a therapeutic staff person
15 at each site 100 percent of the time?

16 A Correct.

17 Q So you were seeking additional therapeutic
18 support in order to be able to provide Life Space
19 Crisis Intervention, group and individual therapy at
20 each site on a more consistent basis?

21 A Yes.

22 Q You mention in the next paragraph in
23 explaining why the problem exists that your staff has
24 continued to decrease as your budget has decreased.

25 Do you see that?

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1 A Yes.

2 Q What was the cause of the decrease in your
3 budget?

4 A Funding, funding costs overall at the State
5 level, the number of students served the way the
6 formula was set up. So the funding has decreased over
7 the years for GNETS in the State grant and Federal
8 grant. So that impacted our program greatly, with us
9 being such a small program.

10 Q When you say funding has decreased over the
11 years, has that decrease over the years been tied to a
12 decrease in the number of students served in GNETS or
13 is that independent of a decrease in students served?

14 A The decrease, I believe, was in part due to
15 the number of students served in GNETS as a whole as
16 well as the training and experience factor of staff.
17 More and more we were getting staff that had less years
18 experience so that impacted our funding as well.

19 Q So part of the funding you receive is tied to
20 how much training and how much experience the staff
21 that you hire have?

22 A Yes.

23 Q So I take it the more training and the more
24 experience your staff have, the more money you receive
25 for your program?

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1 A That's the way it's supposed to work. That's
2 a portion of the budget, yes.

3 Q Has your budget continued to decrease since
4 the time this needs statement was submitted?

5 A Yes.

6 Q Is that decrease for the same reasons as you
7 have just explained or is there anything else?

8 A Yes, decreased numbers, decreased student
9 numbers and decreased training and experience, yes.

10 Q You also say in the paragraph about why the
11 problem exists that your Board of Control has been
12 unable to provide additional local funds to support any
13 position in the last six to seven years.

14 A Correct.

15 Q I take it from our earlier conversation that
16 that also continues to be the case today?

17 A Yes, it does.

18 Q In this paragraph you reference the
19 center-based GNETS program being forced to close by the
20 DOE in July 2017.

21 Do you see that?

22 A Yes.

23 Q That's the same closure that we discussed
24 earlier?

25 A Yes.

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1 Q Am I correct that when your center was forced
2 to close by the Georgia Department of Education, your
3 leadership and therapeutic staff consisted of one
4 director, one coordinator/counselor and one behavior
5 interventionist and one parent worker?

6 A Correct.

7 Q What is the parent worker?

8 A The parent worker at the time was someone with
9 a psychology degree. It is now the person that is
10 seeking professional licensure for psychology.

11 Q When you say it's now the person seeking
12 professional licensure, that wasn't the actual person
13 who filled the parent position but you are saying the
14 position itself is now taken up by that person?

15 A Correct.

16 MS. GARDNER: I would like to have the court
17 reporter please mark this document as Plaintiff's
18 Exhibit 477.

19 (Plaintiff's Exhibit 477 was marked for
20 identification.)

21 (Witness reviewing document.)

22 BY MS. GARDNER:

23 Q Ms. Wolf, you have been handed what's been
24 marked as Plaintiff's Exhibit 477. This is an email
25 thread between you and Amber McCollum. The most recent

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1 email here is from you to Amber McCollum dated May 23,
2 2017 with the subject line, "Re: Question about
3 carryover." The first page of this document is Bates
4 stamped GA03817180.

5 Do you recognize this email?

6 A Yes.

7 Q In this email, am I correct you write to Amber
8 McCollum, "Is there any way that we can request
9 approval for an additional percentage of carryover with
10 our program's move this year from a main center to a
11 satellite program? We have really struggled. The six
12 systems we serve do not intend to provide local
13 funding. I am having to use every bit of our funds for
14 staff, leaving no funding for other needed materials.
15 Thank you for your consideration."

16 Have I read that accurately?

17 A Yes.

18 Q Who is Amber McCollum?

19 A Amber McCollum at the time was the budget
20 liaison at the Department of Education.

21 Q Was she the budget liaison at the Department
22 of Education specifically for GNETS?

23 A That was one of her roles, yes.

24 Q So she was the person you would correspond
25 with at the Department of Education about GNETS of

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1 Oconee's budget?

2 A Yes.

3 Q What were you referring to when you asked
4 about carryover? What is carryover?

5 A Carryover is 6B or Federal funds that are
6 drawn down and a percentage of that is allowable to be
7 carried over into the next fiscal year. So at the time
8 it was 25 percent carryover.

9 Q Here you were asking if that 25 percent
10 carryover could be increased?

11 A Yes.

12 Q Did you receive a response from Amber McCollum
13 about that question?

14 A I believe the response was, let's see, I think
15 it was at the bottom there where she says -- I don't
16 remember if I received a response from her on that.

17 Q You said in the your email that you were
18 having to use every bit of funds for staff leaving no
19 funding for other needed materials?

20 A Correct.

21 Q What other needed materials were you
22 referencing there?

23 A Instructional materials, classroom supplies,
24 things like that.

25 MS. GARDNER: I'd like the court reporter to

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1 mark this document as Plaintiff's Exhibit 478.

2 (Plaintiff's Exhibit 478 was marked for
3 identification.)

4 (Witness reviewing document.)

5 BY MS. GARDNER:

6 Q Ms. Wolf, you have been handed what has been
7 marked as Plaintiff's Exhibit 478. This is an email
8 thread between you and Vickie Cleveland. The most
9 recent email in this thread is from Vickie Cleveland to
10 you dated June 13, 2018. The subject line is "Re:
11 Social Workers."

12 Do you recognize this email?

13 A I don't recall this email, but I recognize it
14 as mine, yes.

15 Q If you could turn to the first email in time
16 in the thread which begins on the second page of this
17 document.

18 A (Indicating affirmatively.)

19 Q Am I correct in understanding from this that
20 Vickie Cleveland reached out to you and Desiree Woods
21 to ask whether the two of you shared a social worker
22 for the FY18 school year?

23 A Yes.

24 Q Who is Desiree Woods?

25 A A fellow GNETS director now retired.

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1 Q Which program was she the GNETS director for?

2 A DeKalb Rockdale.

3 Q Ms. Cleveland also asked the two of you
4 whether you will still need a reimbursement for the
5 social worker for FY19, correct?

6 A Correct.

7 Q How did you respond to Ms. Cleveland's
8 question?

9 A I would have said that, yes, we did need
10 additional therapeutic support funding.

11 Q So in your email responding to Ms. Cleveland,
12 you say, "We definitely need an extra therapeutic
13 support person."

14 Is that correct?

15 A Yes.

16 Q You go on to say, "Can we find our own people,
17 though, and not use Staff Rehab or another agency?"

18 Do you see that?

19 A Yes.

20 Q What's Staff Rehab?

21 A Staff Rehab was a privately run therapeutic
22 agency that would provide support to school systems.

23 Q Had you been required to use Staff Rehab
24 before?

25 A Initially, I don't know that it was a

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1 requirement, but I can't remember how Staff Rehab
2 became involved. That's what we were told to refer
3 through initially, but they really didn't know a lot --
4 I can't remember if it was an individual person. I
5 can't remember the person at all.

6 But I remember that they weren't really
7 trained in how to work with our population. And that's
8 why I was asking.

9 Q You said Staff Rehab is what you were told to
10 refer through initially. Who told you to refer through
11 Staff Rehab initially?

12 A I don't know that Vickie told us that we had
13 to use Staff Rehab. I think that was one of the
14 resources that she suggested. And Ms. Woods had used
15 them in the past as well, so I don't know if other
16 GNETS programs use that same agency or not. I know it
17 wasn't working out with us.

18 Q In here you are asking Vickie Cleveland
19 whether you can not go that route and can instead find
20 your own person?

21 A Correct.

22 Q What was the outcome of that question? How
23 did that get resolved?

24 A I believe that we were able to, that we were
25 allowed to. I don't know if she had emailed me back or

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1 we had a phone conversation, but the answer was yes,
2 essentially.

3 Q You mentioned that one of the issues with
4 Staff Rehab was that they weren't really experienced in
5 working with your population?

6 A Yes.

7 Q When you say your population, what
8 specifically are you referring to?

9 A Students with the most severe behavior and
10 emotional needs. They weren't at the level that they
11 would be able to handle a crisis or even do crisis
12 intervention with them, so.

13 MS. GARDNER: I ask the court reporter to mark
14 this document as Plaintiff's Exhibit 479.

15 (Plaintiff's Exhibit 479 was marked for
16 identification.)

17 (Witness reviewing document.)

18 BY MS. GARDNER:

19 Q You have been handed what has been marked as
20 Plaintiff's Exhibit 479. This is another email thread
21 between you and Vickie Cleveland. The most recent
22 email on this thread is an email from Vickie Cleveland
23 to you dated July 24, 2018. The subject is "Re:
24 Therapeutic Services Reimbursement for Social Workers,"
25 and there is one attachment which is a Word document

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1 with the file name GNETS Contracted Social Worker.

2 The first page of this document has a Bates
3 stamp of GA00329465. Do you recognize this email
4 thread?

5 A I recognize it as being mine. I don't
6 particularly remember it, but yes.

7 Q I want to look at the earliest email in this
8 thread which starts on the second page. Do you see
9 where Ms. Cleveland writes to you and others and says,
10 "The SBOE approved the reimbursements for therapeutic
11 services for social workers for FY19"?

12 A Yes.

13 Q This is the same social worker you were
14 discussing with Ms. Cleveland in the last email
15 exchange we reviewed in Plaintiff's Exhibit 478?

16 A I'm not sure if it's the same one.

17 Q Am I correct that SBOE here refers to the
18 State Board of Education?

19 A Yes.

20 Q Ms. Cleveland goes on to write later on, "I am
21 working on data collection deliverables that the SWs
22 will have to send to GaDOE quarterly regarding services
23 this school year."

24 Do you see that?

25 A Yes.

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1 Q Was the social worker the Georgia Department
2 of Education reimbursed you for required to submit data
3 to the Department of Education about services that the
4 social worker provided?

5 A Yes.

6 Q What kind of data were they required to
7 submit?

8 A They were required to submit a therapeutic
9 services log that indicated the date, the student name
10 and the type of service that was provided and, yes, and
11 who they were.

12 Q How frequently was that data required to be
13 submitted?

14 A Monthly.

15 Q To whom was the data submitted at the
16 department in the Georgia Department of Education?

17 A To Lakeisha Stevenson, who was the assistant
18 for Vickie Cleveland.

19 Q When that data was submitted, who from GNETS
20 of Oconee would actually do the submission?

21 A I would do the submission.

22 Q Would you email that, was there some sort of
23 secure way of transmitting it? How did that work?

24 A We submitted it through the Department of
25 Education's secure porthole by email.

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1 Q Does GNETS of Oconee still submit that sort of
2 data to the Department of Education today?

3 A Yes.

4 Q For which positions on your staff do you
5 submit that data currently?

6 A Primarily from Ms. Brundage, the licensed
7 clinical social worker.

8 Q Do you still submit that data to Ms.
9 Stevenson?

10 A Yes.

11 Q On a monthly basis?

12 A Yes.

13 Q Turning back to the first page of the document
14 which is your response to Ms. Cleveland, you say here,
15 "Are there any protocols about who we contract with?
16 Can we contract directly with a licensed individual
17 rather than using a hiring agency?"

18 Do you see that?

19 A Yes.

20 Q This question is similar in nature to your
21 question about whether you have to use Staff Rehab; is
22 that right?

23 A Yes.

24 Q How did Ms. Cleveland respond to your
25 question?

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1 A I don't recall whether she responded in a
2 written fashion, but the answer was yes, that we could
3 use another agency.

4 Q Ms. Cleveland sends you an email in response
5 to your email on this thread, correct?

6 A Yes.

7 Q She says, "Please send me the resume for the
8 candidate. I have also attached a draft of the social
9 worker responsibilities that I am working on with some
10 of the expectations for services."

11 Correct?

12 A Correct.

13 Q Did you send Ms. Cleveland a resume for the
14 candidate?

15 A I believe so, but as I'm thinking about it,
16 I'm not even sure what the candidate's name was.

17 Q Did you review the draft of the social worker
18 responsibilities that Ms. Cleveland forwarded to you in
19 this email?

20 A Yes.

21 Q What did you do with that draft, if anything?

22 A I believe from the draft, created the job
23 description for that social worker.

24 Q When you say for that social worker, you are
25 talking about the social worker that GNETS of Oconee

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1 ultimately hired?

2 A Yes.

3 Q Ms. Cleveland says in her email that she will
4 share more at an August meeting.

5 Do you see that?

6 A Yes.

7 Q Were these social worker responsibilities
8 discussed at an August meeting?

9 A I don't recall.

10 Q Turning to the attachment that Ms. Cleveland
11 included in her email to you, do you see the section
12 titled General Responsibilities?

13 A Yes.

14 Q In the second paragraph about midway through
15 it says, "Further, the social worker aligns their daily
16 tasks with the identified needs outlined in the GNETS
17 needs assessment submitted to GaDOE. Daily assignments
18 must focus on assisting students with problem solving,
19 conflict resolution and elevated mental health
20 concerns."

21 Do you see that?

22 A Yes.

23 Q Is the needs assessment mentioned here the
24 kind of needs assessment that we reviewed earlier?

25 A I believe so.

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1 Q We talked a bit earlier about the number of
2 students served by GNETS of Oconee. I want to talk a
3 little bit more about the students that your program
4 serves.

5 How do GNETS of Oconee students physically get
6 to their assigned facilities on a daily basis?

7 A Are you talking about mode of transportation?

8 Q Yes.

9 A Typically, the school system provides a school
10 bus and in some cases the parents will transport.

11 Q Do you have a sense roughly of the breakdown
12 in terms of how many of your students percentagewise
13 ride the bus versus are car riders?

14 A I would say probably 20 percent are car
15 riders. And that's just a guess.

16 Q Do you review any information about the length
17 of bus rides for GNETS of Oconee students?

18 A There was a point, and this has been several
19 years ago, where we did discuss the length of bus rides
20 and compared them to the school systems and those
21 lengths of bus rides, so I do recall that conversation
22 among directors.

23 Q You said that was several years ago?

24 A Yes.

25 Q Did that conversation occur at a GNETS

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1 directors meeting?

2 A I believe so.

3 Q When you say that the bus rides were compared
4 to the school system's bus rides, did the directors
5 look at actual data from their programs alongside data
6 about bus rides from whatever county systems they are
7 serving?

8 A I don't recall looking at any hard written
9 data. I remember that we had the discussion about when
10 students get on to the school bus and arrive to the
11 school, that it was comparable in many cases to the
12 school system's.

13 Q Was that conversation initiated by anybody in
14 particular?

15 A I don't recall.

16 Q Do you have any sense for what the longest
17 amount of time any of your GNETS of Oconee students are
18 on the buses?

19 A About an hour, in some cases there were
20 further distances. That was when we were at the
21 center. Now, of course, we are in satellite, so now it
22 may be just as long. It depends on how many kids they
23 are picking up, things like that. But I'm sure it's
24 reduced since we have been in the satellite model with
25 the exception for the ones that have to transport to a

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1 different county.

2 Q For students who have to transport to a
3 different county, about how long are those bus rides?

4 A Approximately 30 minutes.

5 Q Do any GNETS of Oconee students participate in
6 any sort of bus barn or bussing hub where they take one
7 bus to a second location and then get on other buses
8 going elsewhere?

9 A Presently, no.

10 Q Has that ever been a practice in the past?

11 A That has occurred in the past.

12 Q When did that last occur?

13 A The last that I recall is Putnam County
14 because of the distance in the county. It's such a
15 widespread county that in some cases parents brought
16 their kids to a central bus area and that's where kids
17 were transported from.

18 Q Have any of the sites with GNETS of Oconee
19 been impacted by any bus shortages?

20 A Not that I have been ever aware of.

21 Q So you don't have any students who have had to
22 leave school early because of bus shortages or anything
23 like that?

24 A No.

25 Q You have been with GNETS of Oconee for quite

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1 some time. During your time with the program, what's
2 been the shortest length of stay that you can remember
3 for a student?

4 A Not counting kids that were moved in and out
5 of the system from other areas, I am assuming?

6 Q Sorry, can you clarify what you mean by moved
7 in and out of the system?

8 A So a student that transfers in from another
9 county and comes in for a very short stay because they
10 are in a foster care group home and they are moved out
11 very quickly.

12 Q I see. So excluding students who have short
13 lengths of stay because of mobility issues. I am
14 asking, what is the shortest length of stay for a
15 student who is served at GNETS of Oconee and then
16 transitioned back to their home school system?

17 A We are talking about a full-time transition
18 back or a gradual?

19 Q Why don't you tell me both.

20 A So gradual, we have had students that would
21 come into our program and be in our program
22 approximately six to eight weeks, and if they come into
23 our program and they are on green level the entire
24 time, it is really not an appropriate placement for
25 them. So we would start a gradual transition, one

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1 class at a time, two classes until they are fully
2 transitioned out. So I would say anywhere from six
3 weeks to three months stays would be the shortest.

4 Q So six weeks would be the shortest, if we are
5 talking about from the time that they begin receiving
6 GNETS services to the time that they begin to
7 transition into the general education environment?

8 A Yes.

9 Q And then are you saying that three months is
10 the shortest length of stay you can recall in terms of
11 the time from when a student begins to receive GNETS
12 services and is fully transitioned back into a regular
13 environment?

14 A It is really up to the IEP team as far as how
15 fast that transition is going to occur. Sometimes in
16 certain cases with kids, they would be able to handle a
17 full-time transition, and in other cases not. It just
18 depends on the child's needs.

19 Q I am just asking in your experience in terms
20 of what you have actually seen because you have seen a
21 lot of individual students.

22 A Right.

23 Q What's the shortest length of stay you
24 personally have seen in your years at GNETS of Oconee
25 from the time a student begins receiving GNETS services

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1 to the time they are fully transitioned into a normal
2 education environment?

3 A Four to six months.

4 Q What is the longest stay in your experience
5 with GNETS of Oconee that you have seen in terms of the
6 time from when a student begins receiving GNETS
7 services to the time when they are fully transitioned
8 back into the general education environment?

9 A I have had kids their whole school career from
10 probably first, second grade on through high school.

11 Q Do you track average length of stay in any way
12 as GNETS director?

13 A No.

14 Q Are there any sort of markers or other
15 indicators that you use for students who have been in
16 GNETS of Oconee for an extended period of time, for
17 example, is there anything different that happens once
18 a student has been in for four years or five years or
19 ten years than might occur if a student were having a
20 shorter length of stay?

21 A In some cases, further assessment and
22 evaluation, certainly taken into consideration if that
23 student needs to go out for crisis stabilization; and
24 the number of crisis stabilizations that they have had.
25 I think all that, you know, has bearing on how long

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1 they are going to stay, that the IEP team would
2 recommend that they stay.

3 Q But in terms of any kind of trigger points, it
4 sounds like there is not a particular length of time
5 after which there's something different done in terms
6 of how a student is reviewed for transitioning back to
7 a lesser restrictive environment.

8 A Every time the IEP meets, which is at least
9 annually. Of course, we do amendment meetings and
10 things like that. But at least annually we discussed
11 whether that student is ready for transition and if
12 not, why not, you know, the IEP team discusses that.

13 Q Have you had students at GNETS of Oconee
14 transition back into their general education
15 environment and then come back to GNETS of Oconee?

16 A Yes.

17 Q How frequently does that happen?

18 A Not very frequently. Over the course of my
19 career, probably, I mean, I can think of a handful, of
20 maybe six or eight kids.

21 Q How many students transitioned back into the
22 general education environment during the 2021-22 school
23 year from GNETS of Oconee?

24 A And this is just a guess, maybe three.

25 Q This current school year, 2022-23, do you

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1 currently have any students on track to transition back
2 to general education environments?

3 A I'm trying to run through all of my students
4 here. There are a few that are close to transitioning
5 that we feel may be successful, yes.

6 Q Roughly how many students are we talking
7 about?

8 A In the whole program right now, I would say
9 possibly maybe four.

10 Q Have you had any of those students actually
11 transition yet this school year?

12 A We have had added transitional classes for
13 some of the students, so yes, they are beginning the
14 transition process.

15 Q How many of the four have already started to
16 have transition classes in the general education
17 environment?

18 A Well, we do have more that are already
19 transitioning. Are you asking just specifically this
20 year?

21 Q Yes, this year, this school year.

22 A I just want to make sure I'm understanding the
23 question. Are you asking me how many students do we
24 have currently transitioning now or how many of those
25 four students that potentially may go out full-time are

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1 transitioning?

2 Q How many of the four who may go out full-time
3 are already transitioning in terms of spending some of
4 their time in the general education environment?

5 A I believe the three of those four.

6 Q Does GNETS of Oconee strive to return students
7 to their general education setting?

8 A Yes.

9 Q That's the goal?

10 A That is our goal, yes.

11 MS. GARDNER: I'd like to show you another
12 document electronically which I am going to ask be
13 marked Plaintiff's Exhibit 480.

14 (Plaintiff's Exhibit 480 was deemed marked for
15 identification.)

16 (Witness reviewing document.)

17 BY MS. GARDNER:

18 Q Ms. Wolf, this is a spreadsheet that was
19 produced by GNETS of Oconee to the United States in
20 response to a document subpoena. The file name for the
21 document provided electronically was Number 5
22 Enrollment Rosters FY22, FY21, FY20 Student Enrollment
23 Rosters.xlsx. I am going to represent to you that we
24 have hidden the columns containing student first and
25 last name as well as student ID numbers and birth dates

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1 for confidentiality reasons.

2 Do you recognize this document?

3 A I do.

4 Q Did you put this document together?

5 A I did.

6 Q Is this an enrollment roster of GNETS of
7 Oconee students for the FY20, 21 and 22 school years?

8 A Yes.

9 Q This spreadsheet shows each student's grade
10 level; is that right?

11 A That's correct.

12 Q And each student's race?

13 A Yes.

14 Q And each student's sex?

15 A Yes.

16 Q And their home school system?

17 A Yes.

18 Q Their primary and secondary disability?

19 A Yes.

20 Q And whether they participate in any
21 extracurricular activities?

22 A Yes.

23 Q Is it correct according to the spreadsheet
24 that GNETS of Oconee had three first graders in the
25 program at Lakeview Academy in 2021-22?

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1 A Yes.

2 Q The oldest student at GNETS of Oconee was in
3 12th grade that school year; is that correct?

4 A Yes.

5 Q If you will take a look at the 2019-20 tab of
6 the spreadsheet, am I correct that GNETS of Oconee had
7 one pre-K student that year?

8 A I believe that might have been a typo because
9 their home school was Midway Hills Primary School, that
10 they don't handle pre-K. So I think that might have
11 been a typo.

12 Q To the left of this, it says Early Learning
13 Center Baldwin. So are you saying there is
14 disagreement in terms of the two schools that are
15 identified?

16 A Yes, it should be Midway Hills Primary and it
17 should be kindergarten, because we don't serve pre-K.

18 Q That year, you had another kindergartener as
19 well?

20 A Yes.

21 Q Is it fair to say from this chart that most of
22 the students at GNETS of Oconee have EBD?

23 A A very large percentage, yes.

24 Q Is that true across the three fiscal years
25 that are represented in the various tabs?

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1 A Yes.

2 Q Is it also fair to say that very few GNETS of
3 Oconee students have segments of the day with
4 non-disabled peers?

5 A Yes.

6 Q One question for you about last school year,
7 2021-22. Were there any students who graduated from
8 GNETS of Oconee last school year?

9 A Yes.

10 Q How many?

11 A This is guessing, five or six.

12 Q Were there any students last year who dropped
13 out of school who were GNETS of Oconee students?

14 A Yes.

15 Q Approximately how many?

16 A There's at least three that I can think of off
17 the top of my head.

18 Q For the five or six who graduated, did those
19 students participate in the graduation ceremonies for
20 the school-based locations where they were served?

21 A They did.

22 Q Do you regularly track which GNETS of Oconee
23 students graduate each year?

24 A In terms of our data collection, yes, but it's
25 not like a separate report that's maintained. But yes.

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1 Q Do you track whether those students pursue
2 post-secondary education?

3 A We don't.

4 Q Do you track whether those students secure
5 employment?

6 A No. Those are tracked through the home
7 systems.

8 Q Home systems meaning the home school LEA?

9 A Yes.

10 Q Do you regularly track the number of GNETS of
11 Oconee students who drop out?

12 A We do not. Again, there's not a specific
13 report. We could pull that data if we needed to, but
14 we don't do a specific report on that. Again, that's
15 also tracked through the LEA.

16 Q Understood. Does GNETS of Oconee record the
17 attendance of each of its students on a daily basis?

18 A We do.

19 Q How do you record attendance?

20 A We record it both on a GNETS spreadsheet as
21 well as the student information system for the school
22 system that we serve.

23 Q Each school system that GNETS of Oconee serves
24 has a different information system?

25 A Yes, most of them are using Infinite Campus

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1 right now.

2 Q So GNETS of Oconee has access to the student
3 information system for each of the county systems?

4 A We do, yes, in most cases. In smaller, where
5 there is only like two or three students, a lot of
6 times the attendance would be reported to that
7 registrar to put in the attendance. But in our bigger
8 sites, we put in the information.

9 Q Has GNETS of Oconee always had access to the
10 student information systems for the counties that it
11 serves?

12 A No.

13 Q When did GNETS of Oconee start having access
14 to those student information systems?

15 A This is a guess off the top of my head, but
16 probably about 15 years ago.

17 Q Sometime around 2007?

18 A Yes.

19 Q Did that happen for multiple county school
20 systems at the same time or was it patchwork?

21 A Initially, patchwork, but yes, eventually all
22 of them.

23 Q In order for a student to count as being in
24 attendance, what proportion of the instructional day do
25 they have to be physically present?

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1 A They have to be present at least until, for a
2 full-day student, until 11 o'clock, just like in the
3 school systems. It's the same with GNETS.

4 Q So if a student is at school until 11 o'clock
5 and then at 11:30 leaves to go home, they are counted
6 as present?

7 A I believe that's the procedures for each of
8 the school systems we serve, yes. I may be wrong about
9 that. I'm not positive on that.

10 Q Are students at GNETS of Oconee ever sent home
11 due to problem behavior?

12 A Yes.

13 Q How does that work?

14 A If the problem, if it is so significant and
15 the behaviors are dangerous and that student can't
16 safely be managed, we will call the parent for a parent
17 pickup.

18 Q Do the same attendance rules apply there, that
19 if a child was there until at least 11 and you call the
20 parent to pick them up at 11:30, the student is counted
21 as being in attendance?

22 A I believe that's what the school system's
23 policy is in place, yes.

24 Q When parents are asked to pick up students due
25 to problem behavior, is that recorded in any way as an

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1 out of school suspension or is there some report
2 reflecting that action or do you account for that?

3 A If they are picked up early, like before 11,
4 that's counted as a suspension.

5 Q What if they are picked up after 11?

6 A If they have spent the majority of the school
7 day, then no, they are not counted as a suspension.

8 Q Are students ever asked to stay home due to
9 problem behavior?

10 A Without calling it a suspension day?

11 Q Yes.

12 A No.

13 Q Are students ever sent home due to a lack of
14 staff on site?

15 A No.

16 Q On average, what percentage of GNETS of Oconee
17 students are present on any given day?

18 A I really don't have that information. I know
19 in the past when we collected that data, we were at
20 98 percent attendance rate. I suspect it's lower now
21 only because I have some students with repeated
22 absences.

23 Q Does GNETS of Oconee report daily attendance
24 to any other entity?

25 A No.

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1 Q Do your attendance rates affect any funding
2 that you receive?

3 A No, not that I'm aware of.

4 Q Do you report overall enrollment at GNETS of
5 Oconee to any other entity?

6 A We used to. We don't report anymore.

7 Q Who did you used to report to?

8 A We used to report, before we became part of
9 the student information system, we would report the
10 numbers of students served and we are going back 15,
11 20 years ago. Now the State can pull all that data
12 from the system, the student information system.

13 Q Just so I am clear, when you say you used to
14 report numbers of students, were you saying you used to
15 report that to the State or to county systems?

16 A We would report that information to the State.

17 Q Now you are saying the State can just pull
18 that information themselves?

19 A Correct.

20 MS. GARDNER: I would like to ask the court
21 reporter to please mark this as Plaintiff's
22 Exhibit 481.

23 (Plaintiff's Exhibit 481 was marked for
24 identification.)

25 (Witness reviewing document.)

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1 BY MS. GARDNER:

2 Q Ms. Wolf, you have been handed what's been
3 marked as Plaintiff's Exhibit 481. This is an email
4 from Vickie Cleveland to you with a copy to Lakeisha
5 Stevenson dated December 14, 2018. The subject is
6 Enrollment Data and there is one attachment that is a
7 spreadsheet with a file name GNETS Enrollment Info
8 12-14-18. The Bates stamp on the first page of this
9 document is GA00337910.

10 Do you recognize this?

11 A I don't recall it.

12 Q But this is an email that you received from
13 Vickie Cleveland?

14 A Yes.

15 Q In this email, Ms. Cleveland says to you, "See
16 data below. Data reflects your current enrollment
17 numbers reported by you in the FY18 FTE count.
18 Difference is 24 students. I need to know who the
19 students are that transitioned back and what services
20 they are currently receiving and the location."

21 Do you see that?

22 A Yes.

23 Q And then there's a chart below showing the
24 numbers reported by the site as of December 14, 2018
25 and the FY18 FTE count, correct?

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1 A Yes.

2 Q So the numbers reported by December 14, 2018
3 were 73 students, correct?

4 A Yes.

5 Q And the FY18 FTE count was 97 students?

6 A Yes.

7 Q When Ms. Cleveland's email says "transitioned
8 back," what did you understand "transitioned" to mean?

9 A I would think it would mean transitioned fully
10 back into the school system.

11 Q Into the general education environment?

12 A Yes.

13 Q Is the 24 that Ms. Cleveland references in her
14 email the difference between the 73 students reported
15 by sight and then the 97 students reported for the FY1
16 FTE count?

17 A Yes.

18 Q So she is asking you for the names of the
19 GNETS students who returned to their general education
20 environments and the services those students are
21 receiving and where those services are occurring?

22 A Yes.

23 Q Did you provide Ms. Cleveland with the
24 information that she was requesting?

25 A I don't recall. I would assume so.

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1 Q Have you been asked to explain these kinds of
2 discrepancies in enrollment numbers by sight versus an
3 FY FTE count before?

4 A Yes.

5 Q When you provide explanations about those
6 kinds of discrepancies, is that something that you
7 submit through a secure portal as well?

8 A Yes.

9 Q In fact in this email, Ms. Cleveland asked you
10 to send it by portal email to her and Lakeisha,
11 correct?

12 A Yes.

13 Q What other things do you use the portal for?

14 A Therapeutic services, grants, the list of
15 therapeutic services provided, we'll send that through
16 a secure portal. That's where we submit our grant
17 proposal, and any kind of secure information on
18 students to the DOE, that's pretty much it.

19 Q Do you need a break?

20 A I'm good. Thanks for asking.

21 Q No problem. So we talked a little bit about
22 the students who receive services at GNETS of Oconee.
23 I want to step back a little bit and talk about how
24 students find themselves at GNETS of Oconee. Can you
25 just provide for me an overview of how a student is

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1 referred to GNETS of Oconee?

2 A So initially in terms of the special ed
3 continuum, this would be a student that they tried in
4 the general education environment and the student had
5 behavior problems so they would move to a perhaps
6 resource setting followed by a self-contained setting
7 and still have significant behavioral difficulties and
8 challenges. And at that point the IEP team would
9 complete a consideration of services for GNETS.

10 They would convene a team meeting and we would
11 discuss it, whether that is appropriate for that
12 particular student, and if so, at that point decide, do
13 we want to consider other services for that student or
14 consider a part-time placement or a full-time
15 placement.

16 Generally, it's a full-time placement based on
17 the severity of the behaviors which are typically the
18 reasons that kids are being referred to us.

19 MS. GARDNER: I'd like to ask the court
20 reporter to mark this as Plaintiff's Exhibit 482.

21 (Plaintiff's Exhibit 482 was marked for
22 identification.)

23 (Witness reviewing document.)

24 BY MS. GARDNER:

25 Q Ms. Wolf, you have been handed what's been

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1 marked as Plaintiff's Exhibit 482. This is the Georgia
2 Network for Educational and Therapeutic Support
3 confidential student information packet. Do you
4 recognize this document?

5 A I do.

6 Q I believe earlier in discussing the referral
7 process you mentioned a consideration of services
8 packet, is that how you referred to it?

9 A Yes.

10 Q Is this a part of that?

11 A Yes.

12 Q Is this document what you were referring to?

13 A Yes.

14 Q Did you create this document?

15 A Yes, I, along with several directors, created
16 it.

17 Q How is this document used?

18 A This is the document that the referring
19 parties would fill out providing information on the
20 student along with their progress monitoring and
21 assessment information and so forth and they would
22 provide that when considering GNETS services.

23 Q This document on the first page says, "Please
24 review the guiding questions for consideration of GNETS
25 services as well as the GNETS services flow chart to

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1 assist in appropriate educational planning for the
2 student."

3 Do you see that?

4 A Yes.

5 Q Are you familiar with the guiding questions
6 for consideration of GNETS services?

7 A Yes.

8 Q What is that?

9 A So the guiding questions are, you want to make
10 sure that students aren't referred, for example,
11 without a behavior intervention plan and/or functional
12 behavior assessment. So that's one of the guiding
13 questions whether they have had a psychological
14 evaluation within three years, and whether there have
15 been less restrictive interventions tried.

16 So those are all, it is a pretty extensive
17 document. The guiding questions is more, it's like a
18 four or five-page document that has considerations of
19 what the team should consider prior to referring the
20 student to us. And the flow chart itself just kind of
21 shows the whole procedural aspect.

22 MS. GARDNER: I would like to have this
23 document marked as Plaintiff's Exhibit 483.

24 (Plaintiff's Exhibit 483 was marked for
25 identification.)

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1 (Witness reviewing document.)

2 BY MS. GARDNER:

3 Q Ms. Wolf, you have been handed what's been
4 marked as Plaintiff's Exhibit 483. This is the Georgia
5 Network for Educational and Therapeutic Supports
6 guiding questions for consideration of GNETS services.
7 Do you recognize this document?

8 A Yes, I do.

9 Q Is this the guiding questions we were just
10 discussing?

11 A Yes.

12 Q Did you create this document?

13 A Yes, along with several other directors.

14 Q You mentioned before, I believe, that the
15 guiding questions were intended to ensure that certain
16 things are in place before a student is referred for
17 consideration of GNETS services; is that accurate?

18 A That's accurate.

19 Q I believe one of the things you said that the
20 guiding questions is intended to help with is to ensure
21 that students are not referred without a behavior
22 intervention plan?

23 A Correct.

24 Q Why can a student not be referred without a
25 behavior intervention plan?

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1 A Because you would hope that the IEP team, if
2 the behaviors were that significant, that they would
3 complete a behavior intervention plan to try to put
4 those supports and interventions in place prior to a
5 student being referred to GNETS.

6 Q Is there any rule that requires that?

7 A I believe the Department of Education GNETS
8 rule requires the behavior intervention plan.

9 Q What is the Department of Education's GNETS
10 rule?

11 A It is a rule that the State Department of
12 Education came up with regarding GNETS that we are
13 guided by.

14 Q You mentioned before that the guiding
15 questions were also intended to help ensure that
16 students were not referred without a functional
17 behavior assessment; is that right?

18 A Yes, but in some cases a functional behavior
19 assessment hasn't been done and just the behavior
20 intervention plan.

21 Q So you are saying that sometimes students are
22 referred to GNETS and there has not been a functional
23 behavior assessment but there has been a behavior
24 intervention plan?

25 A Correct.

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1 Q I believe you also referenced a psychological
2 evaluation within three years?

3 A Yes.

4 Q Is that a requirement for placement in GNETS?

5 A Yes, I believe it's part of the rule as well.

6 Q Part of the State rule?

7 A Yes.

8 Q This guiding questions document asks whether
9 the student is currently being served in special
10 education.

11 Do you see that?

12 A Yes.

13 Q It says, "If the answer is no, then GNETS is
14 not an appropriate consideration at this time."

15 Do you see that?

16 A Yes.

17 Q Is current service in special education a
18 requirement for placement in the GNETS program?

19 A Yes.

20 Q Where does that requirement come from?

21 A I believe it's -- I'm not sure if it's in the
22 State rule. I'm not sure where it comes from.

23 MS. GARDNER: I'd like to have this document
24 marked as Plaintiff's Exhibit 484.

25 (Plaintiff's Exhibit 484 was marked for

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1 identification.)

2 (Witness reviewing document.)

3 BY MS. GARDNER:

4 Q Ms. Wolf, you have been handed what's been
5 marked as Plaintiff's Exhibit 484. This is the GNETS
6 services flow chart. Do you recognize this document?

7 A I do.

8 Q Is this the flow chart that you were referring
9 to in our earlier discussion?

10 A Yes.

11 Q Did you create this document?

12 A Yes, with several other directors.

13 Q You said earlier that this document kind of
14 provides an overview of the flow of the referral
15 process; is that correct?

16 A Correct.

17 Q What is the difference between the standard
18 process and move-in?

19 A So a standard process would be a student that
20 may have been referred from that school system that the
21 IEP team determines that that student may benefit from
22 GNETS services.

23 A move-in might be a student that is coming
24 from another GNETS program or a program out of state
25 like a therapeutic day treatment program or something

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1 like that. That would be a move-in.

2 Q For move-in, it says, the "student moved in
3 from GNETS or similar program in another state." How
4 is similarity of program determined?

5 A Basically, a review of the IEP would occur as
6 to what types of behaviors that student was in the
7 program for. So if you are talking violent, physically
8 aggressive behaviors, self-harm issues, serious
9 behaviors that are of a serious nature, that would, you
10 know, that would alert systems that this might be a
11 student that's more appropriately served with the GNETS
12 program.

13 Q Is there a consideration of the
14 characteristics of the program itself that the student
15 is coming from?

16 A Yes.

17 Q What are their like look-fors in terms of
18 assessing those programs and determining whether they
19 are similar to GNETS?

20 A Are we talking about out of state programs,
21 pretty much?

22 Q Yes.

23 A Programs that require a therapeutic component,
24 programs where, like I said, you are looking at the
25 intense behavioral needs so you have a highly trained

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1 staff in how to work with that particular student,
2 those types of things.

3 Q Looking back at the standard process, this
4 says, "SpEd director determines behavior problems meet
5 frequency, duration and intensity qualifications and
6 all school steps have been taken."

7 That's the first step in this process?

8 A Yes.

9 Q It then says, "A student information packet is
10 completed."

11 Is that the confidential student information
12 packet that we just reviewed?

13 A Yes.

14 Q It then says, the "GNETS coordinator and SpEd
15 director meet to discuss packet information."

16 Do you see that?

17 A Yes.

18 Q Is there someone from GNETS of Oconee who
19 would meet with the special education director to
20 discuss confidential student information packets?

21 A Yes.

22 Q Who on your staff is responsible for doing
23 that?

24 A Primarily, me.

25 Q Are those in-person meetings that you hold, do

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1 you hold them virtually or by telephone?

2 A Always.

3 Q Which one?

4 A Sometimes virtual, sometimes phone, sometimes
5 face-to-face.

6 Q So it just depends?

7 A Yes.

8 Q When you have those conversations and you are
9 discussing packet information, what in particular are
10 you discussing?

11 A We're making sure that everything that is
12 required for GNETS is included in the packet, the
13 psychological report, the current eligibility and IEP,
14 the monitoring data, functional behavior, assessment
15 behavior, intervention plan, that kind of thing.

16 Q So your discussion is about the completeness
17 of the information being submitted by the county
18 system?

19 A That's correct.

20 Q The next step in the standard process says,
21 "School schedules an IEP meeting and GNETS is
22 considered as an option."

23 Is that right?

24 A Correct.

25 Q For IEP meetings where GNETS is being

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1 considered as an option, does GNETS of Oconee
2 participate in those IEP meetings?

3 A We do.

4 Q Who from GNETS of Oconee participates in those
5 IEP meetings?

6 A Typically, me.

7 Q Who else participates in those IEP meetings?

8 A Ms. Patricia Brundage, the treatment
9 coordinator, she will also participate in those. It's
10 primarily the two of us.

11 Q Is there someone from GNETS of Oconee in all
12 IEP meetings where GNETS is being considered as a
13 placement option?

14 A Yes.

15 Q Have you ever had any situations where there
16 was disagreement on the IEP team about whether a
17 student should be placed at GNETS of Oconee?

18 A Yes.

19 Q How have those disagreements gotten resolved?

20 A Through the IEP discussions.

21 Q So just consensus?

22 A Yes, communication. If GNETS, if we feel that
23 a student is not appropriate for our program, behavior
24 is not severe enough, other factors, the IEP team and
25 we will have that discussion. And typically, they

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1 will -- I have never been in a situation where they
2 over-rid (sic), override, ridden, GNETS, so.

3 Q So you have never been in a situation where an
4 LEA has overridden GNETS' view that a student was not
5 appropriate for GNETS of Oconee?

6 A Correct.

7 Q Have you had IEP meetings where you have
8 expressed that view, that a student is not appropriate
9 for GNETS of Oconee?

10 A Yes.

11 Q In those situations where you have had a
12 student under consideration for GNETS services but
13 where GNETS of Oconee has been of the view that they
14 are not appropriate for GNETS of Oconee, what happens
15 after that?

16 A The student will go back to the system, I
17 mean, remain in the system and they will come up with
18 alternate solutions.

19 Q Does GNETS of Oconee provide any additional
20 consultation or support in those instances?

21 A If requested, yes.

22 Q If that sort of support were requested, what
23 might that look like?

24 A It might look like assisting the system to
25 come up with a functional behavior assessment or it

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1 might look like recommending counseling by outside
2 providers or things like that, suggestions, so forth.

3 Q Does GNETS of Oconee ever have any of its
4 therapeutic staff push into educational environments to
5 support students directly?

6 A Not our GNETS program. We don't have the
7 staff for that.

8 MS. GARDNER: I would like to ask the court
9 reporter to mark this document as Plaintiff's
10 Exhibit 485.

11 (Plaintiff's Exhibit 485 was marked for
12 identification.)

13 (Witness reviewing document.)

14 BY MS. GARDNER:

15 Q Ms. Wolf, you have been handed what's been
16 marked as Plaintiff's Exhibit 485. This is the Georgia
17 Network for Educational and Therapeutic Support Request
18 for GNETS Consultation. Are you familiar with this
19 document?

20 A Yes.

21 Q What is this document?

22 A This document is where systems can request
23 consultative services from GNETS on challenging
24 students.

25 Q Is this the form that an LEA would use? For

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1 example, in the situation that we just discussed where
2 they may want assistance creating an FBA, they would
3 complete this request for consultation?

4 A Yes.

5 Q Once this consultation is completed, what
6 happens to it?

7 A We will, once they fill it out, we will get in
8 touch with the system about the service to be provided
9 and try to provide that service to them.

10 Q Does GNETS of Oconee keep records of requests
11 for consultation that are submitted and what happens
12 with those requests?

13 A We just keep them on file.

14 Q Did you create this request for GNETS
15 consultation document?

16 A With some of the other directors, yes.

17 Q Does GNETS of Oconee keep records of what
18 students are referred for consideration to its GNETS
19 program?

20 A We just keep them on record with that student
21 file when that student is considered incoming to us.
22 We keep the considerations on file.

23 Q So you keep the confidential student
24 information packets on file?

25 A Yes.

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1 Q Do you also keep on file what the outcomes of
2 the referrals for consideration of services were?

3 A In terms of if we get that student, then we
4 have that student information on file, but no, it would
5 be just documented in that student's IEP, that that
6 student did not come to GNETS, for example.

7 Q So for students who are considered for GNETS
8 of Oconee but don't come, you wouldn't have any records
9 showing that there was a determination that they
10 weren't appropriate for GNETS of Oconee, you would just
11 have a confidential student information packet?

12 A Right, the school system would have it
13 documented in the IEP.

14 Q Who is responsible for maintaining those
15 confidential student information packets at GNETS of
16 Oconee?

17 A Me, pretty much.

18 Q Does GNETS of Oconee report the numbers of
19 students referred to its program in any way to any
20 other entities?

21 A No.

22 MS. GARDNER: I think we can take a break.

23 THE VIDEOGRAPHER: We are off the record at
24 3:02 p.m.

25 (Recess.)

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1 THE VIDEOGRAPHER: We are back on the record
2 at 3:13 p.m.

3 BY MS. GARDNER:

4 Q So we were discussing referral of students for
5 GNETS services and we looked at the confidential
6 student information packet and the guiding questions
7 and the GNETS services flow chart and the request for
8 consultation, correct?

9 A Yes.

10 Q You mentioned that you helped put those
11 documents together with some other GNETS directors; is
12 that right?

13 A That's correct.

14 Q Was there some sort of a committee to develop
15 those documents?

16 A There was.

17 Q What was the process leading to that committee
18 being formed?

19 A If I recall, the directors felt they needed to
20 have a uniform consideration packet and make sure that
21 all of us are using the same criteria for a student
22 being admitted into GNETS.

23 Q So in terms of the formation of the committee,
24 how did that work?

25 A I believe we just talked about it as

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1 directors. I remember Vickie Cleveland was in the
2 room.

3 I volunteered to help with it because I like
4 to do that kind of stuff, and there's a couple other
5 directors that worked with me. We drafted it several
6 times, sent it out several times and that's how we
7 developed it.

8 Q Who else was on the committee with you?

9 A Whitney Braddock, Steve Derr. I am trying to
10 think was there anyone else besides us. Those are the
11 only two that I remember. I think there was one or two
12 others.

13 Q Was this an iterative process in the sense
14 that you all developed various drafts and they may have
15 been reviewed and edited as you were developing the
16 final documents?

17 A Yes.

18 Q Was there any participation in the process by
19 the GNETS program manager at the Department of
20 Education?

21 A Only in that we reviewed it and gave feedback
22 and she did participate in some of that, some of those
23 discussions, I think. I remember presenting, I
24 remember her asking me to present the final drafts to
25 the rest of the committee, so.

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1 Q When you say present the final drafts to the
2 rest of the committee --

3 A I mean the rest of the directors. That's what
4 I meant. Sorry.

5 Q Understood.

6 MS. GARDNER: I would like to have the court
7 reporter mark this document as Plaintiff's
8 Exhibit 486.

9 (Plaintiff's Exhibit 486 was marked for
10 identification.)

11 (Witness reviewing document.)

12 BY MS. GARDNER:

13 Q Ms. Wolf, you have been handed what's been
14 marked as Plaintiff's Exhibit 486. This is an email
15 from you to Steve Derr, Whitney Braddock with a cc to
16 Nakeba Rahming dated September 26, 2017.

17 The subject is Consideration of Services and
18 there are three attachments to the email, the GNETS
19 Confidential Student Information Packet, the GNETS
20 Services Flow Chart and Guidance for GNETS Placements.
21 The first page of this document has a Bates stamp
22 GA00793042.

23 Do you recognize this email?

24 A I do.

25 Q I believe you said earlier that Steve Derr and

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1 Whitney Braddock were the other members on the
2 committee with you to develop the consideration of
3 services documents?

4 A Yes.

5 Q Is it fair if I refer to these documents as
6 consideration of services documents?

7 A Sure.

8 Q Will you understand what I mean?

9 A I will.

10 Q In this email, you write to Ms. Braddock and
11 Mr. Derr and you say, "Thanks for being here today. So
12 just to recap, Nakeba wants us to take the attached
13 documents and make sure that they are aligned with the
14 new GNETS rule which can be found at," and you include
15 a link presumably to the new GNETS State rule; is that
16 right?

17 A Yes.

18 Q Did you send this email following a meeting
19 with Ms. Braddock and Mr. Derr?

20 A Yes.

21 Q That was a meeting to discuss the
22 consideration of services documents?

23 A I believe so, yes.

24 Q Did Ms. Rahming participate in that meeting?

25 A I think she did. I think we were in a

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1 directors' meeting and we discussed it and Whitney,
2 Steve and I volunteered to work on that packet. I
3 think that's how it all came about.

4 Q What did it mean for you to make sure the
5 documents were aligned with the new GNETS rule?

6 A Because of the specifics in the rule about
7 having a behavior intervention plan and the
8 psychological within three years, things like that.

9 Q So Ms. Rahming wanted to make sure that the
10 documents you all were drafting would include or be
11 consistent with the terms of that rule?

12 A Correct.

13 Q Did you all do that?

14 A We did.

15 Q So the consideration of services documents
16 that we have looked at earlier are all aligned with the
17 GNETS state rule?

18 A Yes.

19 Q In this email, you also say a bit farther
20 down, "Nakeba will send out her draft of the guidance
21 document."

22 Do you see that?

23 A Yes.

24 Q What is the guidance document that you are
25 saying Ms. Rahming will send out?

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1 A I don't know what that document was.

2 MS. GARDNER: I'd like to have this marked as
3 Plaintiff's Exhibit 487.

4 (Plaintiff's Exhibit 487 was marked for
5 identification.)

6 (Witness reviewing document.)

7 BY MS. GARDNER:

8 Q Ms. Wolf, you have been handed what's been
9 marked as Plaintiff's Exhibit 487. This is an email
10 from you to Nakeba Rahming with a cc to Steve Derr and
11 Whitney Braddock. The subject is Consideration for
12 Services.

13 The email was sent on October 4, 2017 and it
14 attaches several documents, a draft GNETS confidential
15 student information packet, a draft GNETS request for
16 consultation, a draft GNETS services flow chart and a
17 draft guidance for GNETS placements. The Bates stamp
18 on the first page of this document is GA00794159.

19 Do you recognize this document?

20 (Witness reviewing document.)

21 A Yes.

22 Q By the time of this email, had you insured
23 that the consideration of services documents were
24 aligned to the GNETS State rule?

25 A Yes.

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1 Q In this email you are asking for Ms. Rahming's
2 permission to send the documents to other GNETS
3 directors for their review and feedback?

4 A Yes.

5 Q Did you receive the green light from Ms.
6 Rahming to do that?

7 A I did.

8 MS. GARDNER: Let's have this document marked
9 as Plaintiff's Exhibit 488.

10 (Plaintiff's Exhibit 488 was marked for
11 identification.)

12 (Witness reviewing document.)

13 BY MS. GARDNER:

14 Q Ms. Wolf, you have been handed Plaintiff's
15 Exhibit 488. This is an email from you to a large
16 email distribution list sent on October 4, 2017. The
17 subject is Consideration for GNETS Services - Draft of
18 Forms.

19 The email has several attachments including a
20 draft GNETS confidential student information packet, a
21 draft GNETS request for consultation, a draft GNETS
22 services flow chart, and a draft guidance for GNETS
23 placements. The Bates stamp on this is GA00794197.

24 Do you recognize this document?

25 A I do.

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1 Q Is this a copy of the email where you
2 distributed the consideration of services forms to the
3 GNETS directors for their review and feedback?

4 A Yes.

5 Q This email references a webinar to train staff
6 on the use of the documents. Do you see that?

7 A Yes.

8 Q Did that webinar occur?

9 A No, I remember doing it at a face-to-face
10 directors' meeting shortly after but I don't remember
11 the exact date.

12 MS. GARDNER: Let's have this document marked
13 as Plaintiff's Exhibit 489.

14 (Plaintiff's Exhibit 489 was marked for
15 identification.)

16 (Witness reviewing document.)

17 BY MS. GARDNER:

18 Q Ms. Wolf, you have been handed what's been
19 marked as Plaintiff's Exhibit 489. This is an email
20 thread between you and Nakeba Rahming. The most recent
21 email is sent from you to Ms. Rahming on October 24,
22 2017 with the subject "Re: Consideration for GNETS
23 Services Meeting today at one p.m." The Bates stamp on
24 the initial page is GA00132036.

25 If you turn to the last page to the first in

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1 time email, do you see your email to Ms. Rahming on
2 October 24, 2017 at 8:32 a.m. where you say, "Good
3 morning, Nakeba. Are you planning to be online today
4 for the meeting at one p.m. on the Consideration of
5 Services? If not, please let me know what I should
6 tell Directors regarding implementation of these forms.
7 Are they to be implemented immediately, in January or
8 in FY19? I'm sure this question will come up."

9 Do you see that?

10 A Yes.

11 Q So there was a meeting that was going to be
12 occurring on the consideration of services form?

13 A Yes.

14 Q Was that meeting with other GNETS directors?

15 A Yes.

16 Q Here you are reaching out to Ms. Rahming to
17 get clarity about when other GNETS directors should
18 start using the consideration of services forms; is
19 that correct?

20 A Yes.

21 Q Ms. Rahming responds to your email and says,
22 "Yes, I will be on. We can begin implementation at the
23 beginning of a new school year."

24 Do you see that?

25 A Yes.

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1 Q Did she participate in that meeting?

2 A Yes.

3 Q Were those consideration of services forms
4 implemented at the beginning of a new school year?

5 A Yes.

6 Q By beginning of a new school year, is that a
7 reference to the 2018-2019 school year?

8 A Yes.

9 MS. GARDNER: I'd like to have this document
10 marked as Plaintiff's Exhibit 490.

11 (Plaintiff's Exhibit 490 was marked for
12 identification.)

13 (Witness reviewing document.)

14 BY MS. GARDNER:

15 Q Ms. Wolf, you have been handed what's been
16 marked as Plaintiff's Exhibit 490. This is an email
17 from you to Nakeba Rahming dated November 7, 2017. The
18 subject is "Re: Upcoming LEA collaborative meeting for
19 GNETS December 7th," and this email attaches the
20 consideration of services forms. The beginning Bates
21 stamp on this document is GA01941385.

22 Do you recognize this document?

23 A Yes.

24 Q You note in your email to Ms. Rahming that the
25 documents you attach are the final documents and you

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1 ask her if she can have them printed for the
2 participants of the collaborative; is that correct?

3 A Yes.

4 Q What is the collaborative referenced here?

5 A That's all the directors meeting together.

6 Q All of the GNETS directors?

7 A GNETS directors, yes.

8 Q Is that the same as the LEA collaborative
9 meeting that's referenced in the subject line of this
10 email?

11 A Okay, no, that was a meeting that we had the
12 LEAs present where we all came together as the State in
13 Macon. So that's what that collaborative is.

14 Q So this collaborative meeting involved LEAs
15 and GNETS directors?

16 A Yes.

17 Q Did Ms. Rahming participate in that LEA
18 collaborative meeting?

19 A She did.

20 Q If you turn to the second page, do you see the
21 email at the bottom from Matt Jones sent on November 6,
22 2017?

23 A Yes.

24 Q That email was sent to K12 superintendents and
25 RESA directors with a copy to Nakeba Rahming; is that

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1 correct?

2 A Yes.

3 Q In the email Mr. Jones says, "Attached is an
4 agenda for a 2018 fall LEA collaborative meeting held
5 on December 7, 2017 from 9:30 a.m. to 1 p.m. at the
6 Marriott Macon City Center," and then it has the
7 address. Mr. Jones goes on to say, "The purpose of
8 this meeting is to introduce the guidance for the GNETS
9 rule, share a streamlined process with LEAs when they
10 are considering students for GNETS services, and engage
11 GNETS and LEAs in a discussion to plan five regional
12 parent university sessions across the State."

13 Do you see that?

14 A I do.

15 Q So these were the things that were going to be
16 covered at the LEA collaborative meeting that you were
17 forwarding final consideration of services documents
18 forms for?

19 A Yes.

20 Q Did you attend that meeting?

21 A Yes.

22 Q Who is Matt Jones?

23 A The chief of staff of the Department of
24 Education.

25 Q Did Mr. Jones attend this LEA collaborative

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1 meeting?

2 A I believe so, yes.

3 Q Did anyone else from the State Department of
4 Education attend the collaborative meeting?

5 A I believe Vickie Cleveland was there and I'm
6 not sure who else.

7 Q You note in your email that you would prepare
8 a presentation for the collaborative. Did you do that?

9 A I did.

10 MS. GARDNER: I'd like to ask that this
11 document be marked as Plaintiff's Exhibit 491.

12 (Plaintiff's Exhibit 491 was marked for
13 identification.)

14 (Witness reviewing document.)

15 BY MS. GARDNER:

16 Q Ms. Wolf, you have been handed what's been
17 marked as Plaintiff's Exhibit 491. This is an email
18 from you to Nakeba Rahming dated November 16, 2017.
19 Vickie Cleveland is also included in this email and the
20 subject is "PowerPoint for LEA Collaborative
21 December 7th on Consideration of Services."

22 There are several attachments to this email
23 that are consideration of services forms. The Bates
24 stamp on the first page of this document is GA00013170.

25 Do you recognize this email?

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1 A I do.

2 Q In this email, do you provide to Ms. Rahming
3 and Ms. Cleveland the presentation that you indicated
4 you would prepare for the LEA collaborative meeting?

5 A Yes.

6 Q I want to take a look at Page 3 of that
7 presentation. This slide is titled Roll Out, correct?

8 A Correct.

9 Q Then beneath that it says, "Fall of 2018" and
10 it also says, "Some programs to pilot beginning in
11 January of this year."

12 Do you see that?

13 A Yes.

14 Q Were the consideration of services forms
15 piloted by some GNETS programs before they were fully
16 rolled out in the fall of 2018?

17 A Yes.

18 Q That pilot began in January of 2018?

19 A Yes.

20 Q How many programs participated in the pilot?

21 A I don't recall.

22 Q Did GNETS of Oconee participate?

23 A Yes.

24 Q What happened after the initial pilot phase?

25 A After the pilot phase, we came, I believe we

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1 came back together again in the summer and just went
2 through everything again with the directors. And that
3 was our rollout in the fall.

4 Q Were there changes made to the consideration
5 of services form between the end of the pilot phase and
6 when they were rolled out in the fall of 2018?

7 A I believe there was just some minor changes in
8 typos and formatting and things like that.

9 MS. GARDNER: I'd like to ask that this
10 document be marked as Plaintiff's Exhibit 492.

11 (Plaintiff's Exhibit 492 was marked for
12 identification.)

13 (Witness reviewing document.)

14 BY MS. GARDNER:

15 Q Ms. Wolf, you have been handed Plaintiff's
16 Exhibit 492. This is an email thread between Nakeba
17 Rahming, you, Whitney Braddock, Steve Derr and Vickie
18 Cleveland. The most recent email in the thread is an
19 email from Ms. Rahming to you, Steve Derr, Whitney
20 Braddock and Vickie Cleveland. The subject is "Re:
21 Consideration of Services - Revised" and that's sent on
22 December 11, 2017. The Bates stamp on the first page
23 of this document is GA00014016.

24 Do you recognize this email thread?

25 A Yes.

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1 Q I want to start at the bottom with the email
2 from you to Steve Derr, Whitney Braddock and Nakeba
3 Rahming. In it you say, "I wanted you each to take a
4 look at the consideration of services student
5 information packet based on the discussion yesterday
6 about insuring that the EBD part is removed. Please
7 review the highlighted area and let me know what you
8 think. Should we keep in those 45 criteria and just
9 not mention EBD or take that part out completely?"

10 Do you see that?

11 A Yes.

12 Q What was the discussion about ensuring the EBD
13 part is removed?

14 A There were several GNETS programs that have
15 served other disabilities, and it was felt that it was,
16 placement consideration was up to the IEP team. So
17 they felt that the disability of EBD should be removed.

18 Q Had that been included in a form as criteria?

19 A I believe so, yes.

20 Q So in your email, you are inquiring whether
21 you should keep certain criteria that support the
22 characteristics of EBD but just not mention EBD
23 specifically?

24 A Correct.

25 Q Nakeba Rahming responds to your email. In

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1 here she says, "I do like the new version and the
2 bullets that support the characteristics of EBD."

3 Do you see that?

4 A Yes.

5 Q What was the ultimate conclusion on this
6 question?

7 A That I believe that we would keep out the EBD
8 and allow, ensure that the IEP teams are coming up with
9 the decision if someone that is not, doesn't have the
10 disability of EBD, that they can still benefit from our
11 program.

12 Q Did you keep in the criteria that supported
13 the characteristics of EBD?

14 A I believe we did, yes.

15 MS. GARDNER: I'd like to have this marked as
16 Plaintiff's Exhibit 493.

17 (Plaintiff's Exhibit 493 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q Ms. Wolf, you have been given Plaintiff's
22 Exhibit 493. This is an email from you to Vickie
23 Cleveland dated June 20, 2018 with the subject
24 "Finalized Consideration of Services Forms." It
25 contains several attachments, the GNETS Confidential

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1 Student Information Packet as of June 20, 2018; the
2 GNETS Request for Consultation as of June 20, 2018; the
3 GNETS Services Flow Chart; and Guidance for GNETS
4 Placements as of June 20, 2018. The Bates stamp on the
5 first page of this document is GA00327280.

6 Do you recognize this email?

7 A I do.

8 Q Am I correct that in this email you write to
9 Vickie, "I made all of the changes we discussed
10 yesterday regarding the Consideration of Services
11 forms. Please have the DOE attorney look them over and
12 let me know if changes need to be made. When I get the
13 go-ahead from you, I will post them on the GNETS
14 director's notebook."

15 Is that right?

16 A Correct.

17 Q What's the GNETS director's notebook?

18 A The GNETS director's notebook was a
19 centralized resource for GNETS directors where they can
20 access the rule, these forms, any resources shared
21 among our programs. It was on Microsoft 365,
22 director's notebook, but it wasn't really utilized the
23 way we had intended, so.

24 Q When you say it wasn't utilized in the way you
25 had intended, what do you mean by that?

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1 A We just -- it kind of fizzled out. It wasn't
2 something that was around for very long.

3 Q Was it the equivalent of like a Sharepoint
4 site, something like that?

5 A Yes.

6 Q So the time that you sent this email, this
7 would have been after the pilot phase for the
8 consideration of services forms had ended?

9 A Correct.

10 Q Did the DOE attorney look the documents over
11 as you requested?

12 A I don't know.

13 MS. GARDNER: I'd like to have this marked as
14 Plaintiff's Exhibit 494.

15 (Plaintiff's Exhibit 494 was marked for
16 identification.)

17 (Witness reviewing document.)

18 BY MS. GARDNER:

19 Q You have been handed Plaintiff's Exhibit 494.
20 This is an email from you to Vickie Cleveland dated
21 June 21, 2018 with the subject "Consideration." The
22 Bates Stamp on this email is GA00327446.

23 Am I correct that here you are following up
24 with Ms. Cleveland to request that she let you know
25 when, quote, "legal has reviewed the consideration

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1 forms"?

2 A Correct.

3 Q And here you say, "Directors are chomping at
4 the bit to get them"?

5 A Correct.

6 Q Correct that you were waiting to release the
7 consideration of services forms to the GNETS directors
8 until you heard that legal had reviewed those forms?

9 A Yes.

10 Q By legal here, you are referencing the
11 Department of Education's attorneys?

12 A Yes.

13 Q The State Department of Education's attorneys?

14 A Correct.

15 MS. GARDNER: I'd like to have this marked as
16 Plaintiff's Exhibit 495.

17 (Plaintiff's Exhibit 495 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q You have been handed Plaintiff's Exhibit 495.
22 This is an email from you dated July 16, 2018. The
23 subject is "Consideration of Services Forms Are Ready."
24 It is sent to a distribution list of various folks and
25 the Bates stamp on the first page of this document is

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1 GA00328367.

2 This is an email from you to the other GNETS
3 directors; is that correct?

4 A Yes.

5 Q Am I correct that in this email you are
6 relaying to them that Vickie Cleveland has given you
7 the go ahead for the consideration of services forms?

8 A Yes.

9 Q So you heard back from Ms. Cleveland and she
10 said that you could release the consideration of
11 services forms to the other GNETS directors?

12 A Yes.

13 Q In here you note that those forms could be
14 found on the GNETS directors' notebooks, correct?

15 A Correct.

16 Q To what extent have the consideration of
17 services forms that you provided at this time been
18 changed from 2018 to now?

19 A Very minor changes, and I believe in one case
20 there was some demographic data that was inadvertently
21 left off. And so that was included. Minor changes.

22 Q When those minor changes have been made, are
23 the forms updated to reflect kind of the date that they
24 were updated?

25 A I don't believe so.

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1 Q You mentioned that you were previously a
2 member of the GNETS executive committee, correct?

3 A Correct.

4 Q What was the role of the GNETS executive
5 committee?

6 A The role was to make decisions about
7 GNETS-wide professional learning; what the agendas
8 would be for our meetings; things like that.

9 Q Did the GNETS executive committee meet on a
10 regular basis?

11 A Yes.

12 Q How frequently did you meet when you were a
13 member of the committee?

14 A About four or five times a year.

15 Q Were you ever a member of any other GNETS
16 network-wide committees apart from the GNETS executive
17 committee?

18 A Yes, I have been a member of, we had a
19 professional learning committee. We had committees on
20 academic planning -- I wasn't on that committee.
21 Therapeutic support committees. I've just been on
22 various ones throughout my career.

23 Q Were those committees similar to the GNETS
24 executive committee in terms of how frequently they
25 met?

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1 A Yes.

2 MS. GARDNER: I'd like to have this document
3 marked as Plaintiff's Exhibit 496.

4 (Plaintiff's Exhibit 496 was marked for
5 identification.)

6 (Witness reviewing document.)

7 BY MS. GARDNER:

8 Q You have been handed Plaintiff's Exhibit 496.
9 This is an email from you to Nakeba Rahming sent on
10 January 17, 2017. The subject is Final Recommended
11 Agenda and there is one attachment to the email which
12 is a Word document with the file name GNETS Director's
13 Meeting Final Agenda 1-24 to 25-2017. The Bates stamp
14 on the first page of this document is GA00130964.

15 Do you recognize this document?

16 A Yes.

17 Q Is this email discussing the agenda for an
18 upcoming GNETS directors meeting?

19 A Yes.

20 Q You say early in the email, you write,
21 "Nakeba, We (Najma, Desiree, Kerri and I) met and
22 recommend that we hear from you with updates on the
23 first day instead of the second day to give you more
24 time with updates and questions."

25 Do you see that?

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1 A Yes.

2 Q Were you, Najma, Desiree and Kerri members of
3 some sort of committee?

4 A Yes.

5 Q What committee was that?

6 A I can't remember if it was the professional
7 learning or executive committee. I think it was
8 executive committee.

9 Q So as of January 2017, you were on the GNETS
10 executive committee?

11 A Yes.

12 Q Prior to you sending this email, y'all had
13 gotten together and put together a recommended agenda
14 for the upcoming GNETS directors meeting?

15 A Yes.

16 Q You mention in the question that's identified
17 as Number 2 in this email, it says, "Directors would
18 like a followup question and answer session from you on
19 the following to review the expectations for the
20 remainder of the year for our mandated interventions."

21 Do you see that?

22 A Yes.

23 Q It says, "Please also reiterate due dates,"
24 and goes on to say, "What are the next steps for each
25 of these areas?" Those areas that are listed include

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1 iReady, BASC-3/Flex Monitoring, SDQ, FBA/BIP and Trauma
2 Informed Care.

3 Do you see that?

4 A Yes.

5 Q Is this list beginning with iReady, the
6 mandated interventions that you are referring to in
7 this section?

8 A Yes.

9 Q Those were mandated interventions for GNETS
10 programs?

11 A Yes.

12 Q Who mandated those particular interventions?

13 A I believe Nakeba Rahming.

14 Q So some of these we have discussed already. I
15 think you told me a little bit earlier about iReady,
16 correct?

17 A Correct.

18 Q What is BASC-3/flex monitoring?

19 A So BASC-3 is the Behavior Assessment System
20 for Children, Version 3. The flex monitoring is part
21 of the BASC. It is a different assessment that's more
22 of a progress monitoring tool. So the BASC is a tool
23 that teachers would fill out to determine the level of
24 behavior intensity for student behaviors and emotional
25 needs.

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1 Q What about the SDQ?

2 A The SDQ is a Strength Difficulties
3 Questionnaire and it is a screener to basically
4 identify difficulties that students may have in
5 behaviors, relationships with others, emotional needs.
6 So it is a general screener to see where students are,
7 whether at low risk for behavior disorder, emotional
8 disorder or if they are at a high risk. And the
9 student and teacher and parent fills that out.

10 Q FBA, that's Functional Behavioral Assessment
11 and Behavior Intervention Plan?

12 A Yes.

13 Q In what ways were those mandated
14 interventions?

15 A So the mandate was that with GNETS students,
16 that they should have a functional behavior assessment
17 done every year by GNETS, and that feeds the behavior
18 intervention plans, to see if it needs to be updated or
19 changed.

20 Q The last one here, trauma-informed care, what
21 is that?

22 A Having, ensuring that all of our staff are
23 trained in trauma-informed care across the board.

24 Q Turning to the actual agenda that you attached
25 to the email, this agenda on day two says that from ten

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1 o'clock to 10:45 Dante McKay of DBHDD would present on
2 accessing DBHDD resources and services. Do you see
3 that?

4 A I do.

5 Q Did Mr. McKay conduct that presentation?

6 A It's a long time ago. I am assuming so. But
7 I don't recall.

8 Q What was the goal of having Mr. McKay attend
9 the GNETS directors meeting?

10 A I believe continuity of services for the kids
11 that have the most severe needs to ensure that
12 communication exists between the Department of
13 Behavioral Health and Disabilities to see if there's
14 other resources or grant opportunities or anything that
15 we could also benefit from. I don't remember
16 specifically what he talked about.

17 Q When you said that the goal was continuity of
18 services for kids with the most severe needs to ensure
19 that communication exists between the Department of
20 Behavioral Health and Disabilities, when you say to
21 ensure that communication exists, are you talking about
22 communication between DBHDD and some other entity?

23 A And GNETS.

24 Q And GNETS?

25 A Yes.

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1 Q To what extent is there presently
2 communication between DBHDD and GNETS?

3 A Through interagency really is the primary mode
4 of communication between them, and I think, as I'm
5 thinking about them, I'm wondering if that was -- I
6 really don't know. But that is one of the primary ways
7 we communicate with them.

8 Q Are there other ways that you think it would
9 be beneficial to communicate with DBHDD apart from the
10 interagency TMI, I assume is what you are referring to?

11 A I think, and it's been several years ago now,
12 but they have a statewide meeting with DBHDD and all
13 care providers that come in and we participate in that.
14 We haven't participated in that in a number of years,
15 so I do think it would be beneficial, yes.

16 Q Do you ever reach out to the State Department
17 of Education with questions about students that school
18 districts may want to refer to GNETS of Oconee?

19 A I don't recall that I reached out to them
20 about student issues.

21 Q You mentioned earlier, we were talking about
22 the portal that you used to communicate with the
23 Georgia Department of Education. Do you recall that?

24 A Yes.

25 Q I believe you were explaining some of the

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1 things you used the portal for and you were discussing
2 the GNETS grant application and the therapeutic
3 services log.

4 A Yes.

5 Q You also mentioned that you would use the
6 portal to communicate secure information on students to
7 the State Department of Education?

8 A Correct.

9 Q I'm wondering what kind of secure information
10 on students were you referring to?

11 A If they require us to send any student
12 information that would have their GTID or any personal
13 identifiers on there, then we would have to send it
14 through the portal.

15 MS. GARDNER: I'd like to have this document
16 marked as Plaintiff's Exhibit 497.

17 (Plaintiff's Exhibit 497 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q You have been handed Plaintiff's Exhibit 497.
22 This is an email thread between you and Nakeba Rahming.
23 The most recent email in the thread is an email from
24 you to Nakeba Rahming on November 18, 2016 with the
25 subject "Re: Four-year-olds." The Bates Stamp on the

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1 first page of this document is GA00042505.

2 Do you recognize this email thread?

3 A Yes.

4 Q I want to start with the earliest in time
5 email which appears on the second page. Am I correct
6 that you wrote to Nakeba Rahming saying that you had a
7 four-year-old not turning five until May and you write,
8 "Since the new rule isn't in effect, can we serve him
9 in our GNETS classroom? Just making sure."

10 Do you see that?

11 A Yes.

12 Q When you say the new rule isn't in effect,
13 what rule are you referring to?

14 A Just the GNETS rule.

15 Q Am I correct in understanding that there was a
16 new GNETS rule that eventually went into effect in
17 2017?

18 A Yes.

19 Q Is that the rule that you are speaking of at
20 this time?

21 A Yes.

22 Q It hadn't yet been enacted?

23 A Correct.

24 Q Since it hadn't yet been enacted, you were
25 asking Ms. Rahming if you could serve a four-year-old

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1 at GNETS of Oconee?

2 A Yes.

3 Q Was it your understanding that the new rule
4 would prevent a student that age from being served in
5 GNETS?

6 A It was.

7 Q At the time you made this inquiry, were you
8 already serving the four-year-old or was this a new
9 student?

10 A I can't recall.

11 Q What was Ms. Rahming's response to you?

12 A She responded, "That's correct. The new age
13 will not take effect until the new rule is initiated."

14 Q So she confirmed that GNETS of Oconee could
15 serve a four-year-old because the new rule hadn't yet
16 taken effect?

17 A Correct.

18 Q Did GNETS of Oconee serve that four-year-old
19 you were writing about?

20 A I believe so, yes.

21 MS. GARDNER: I'd like to have this marked as
22 Plaintiff's Exhibit 498.

23 (Plaintiff's Exhibit 498 was marked for
24 identification.)

25 (Witness reviewing document.)

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1 BY MS. GARDNER:

2 Q You have been handed Plaintiff's Exhibit 498.
3 This is an email thread involving Nakeba Rahming, you
4 and Brooke Cole. The most recent email is from Nakeba
5 Rahming to you with a copy to Brooke Cole dated
6 August 2, 2016. The subject is "Re: Jasper County,"
7 and the first page of this document is Bates stamped
8 GA00781443.

9 Do you recognize this email thread?

10 A I do.

11 Q If you look at the bottom of the page, the
12 first in time email, am I correct that you reach out to
13 Ms. Rahming on August 1, 2016 and you say, "Good
14 evening, Nakeba. Can Elam Alexander Academy serve
15 Jasper County students even though Jasper County falls
16 under GNETS of Oconee catchment?"

17 A Yes.

18 Q What prompted this question?

19 A Jasper County wanted to serve a student at
20 Elam Alexander Academy.

21 Q Is this the same student we discussed earlier?

22 A I believe so, yes.

23 Q That was a student that you said was
24 physically aggressive and there was some discussion
25 about whether that student would be better served at

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1 Elam Alexander?

2 A Yes.

3 Q What was Ms. Rahming's response to you?

4 A She said that Jasper County is in the
5 catchment area the for Oconee GNETS program and that
6 students will need to receive services in their service
7 area by the Oconee program or their local school
8 district.

9 And then another concern would be the
10 distance. Jasper County students would need to travel
11 to receive services at Elam.

12 Q So Ms. Rahming told you and Ms. Cole that Elam
13 Alexander could not serve Jasper County students,
14 right?

15 A That's correct.

16 Q Once a student arrives at GNETS of Oconee, are
17 they given any assessments to determine where they are
18 behaviorally?

19 A Not initially. Initially the parent is given
20 the strengths/difficulties questionnaire. If the
21 student is 11 to 17, they are given the
22 strengths/difficulties questionnaire so we can gauge
23 what the parent thinks. But we wait, we wait for a
24 period of time until we administer any behavioral
25 assessments because there is usually a honeymoon-type

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1 period or just adjustment phase the teacher needs to
2 get to know the student.

3 Q But eventually, you administer the SDQ?

4 A We do, the SDQ and BASC.

5 Q And those were two of the mandated
6 interventions that we reviewed earlier?

7 A Yes.

8 Q How often is the BASC mandated?

9 A It's mandated at least once a year. Some
10 programs choose to do it once a year, some do it twice
11 a year.

12 Q How often is the SDQ mandated?

13 A Twice a year, fall and then spring followup.

14 Q When we were discussing the interagency teams
15 that you indicated GNETS of Oconee participates in, are
16 those teams also referred to as local interagency
17 planning teams?

18 A They are, yes.

19 Q Is the acronym LIPT used for that?

20 A Yes.

21 MR. NGUYEN: Let's have this document marked
22 as Plaintiff's Exhibit 499.

23 (Plaintiff's Exhibit 499 was marked for
24 identification.)

25 (Witness reviewing document.)

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1 BY MS. GARDNER:

2 Q Ms. Wolf, you have been handed Plaintiff's
3 Exhibit 499. This is an email from you to Vickie
4 Cleveland dated June 14, 2018. The subject is
5 Suggestion and it includes one attachment which is a
6 pdf with the file name GNETS 2017-2018 Screening,
7 Diagnostic and PL Calendar. The Bates stamp on the
8 first page of this document is GA00326222.

9 Do you recognize this email?

10 A I do.

11 Q Am I correct that in this email you write to
12 Vickie and you say, "Last year Nakeba gave us a
13 calendar giving us all the dates for the year and this
14 is extremely helpful."

15 Is that right?

16 A Yes.

17 Q You provide that calendar that you say Ms.
18 Rahming provided in your email to Ms. Cleveland,
19 correct?

20 A Yes.

21 Q When you say, "Last year Nakeba gave us a
22 calendar," who is the us referring to?

23 A The GNETS directors.

24 Q What was the purpose of the attached calendar
25 when Ms. Rahming gave it to you and the other GNETS

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1 directors?

2 A It gives directors an overview of when the
3 different interventions and assessments are due as well
4 as the grant proposal which is all the responsibilities
5 throughout the year.

6 Q Did Ms. Rahming create that calendar?

7 A I can't remember if she created it or I
8 created it, this particular one.

9 Q What prompted you to send the calendar to Ms.
10 Cleveland?

11 A With Ms. Cleveland taking over the position
12 for Ms. Rahming, we felt we needed to have a calendar
13 so we would know what the expectations are for the
14 coming year.

15 Q So if you turn to the calendar, the first page
16 of the calendar is August 2017, correct?

17 A Correct.

18 Q Am I correct that this shows that iReady
19 diagnostic begins on August 7th?

20 A Yes.

21 Q And iReady diagnostic ends on September 15,
22 2017?

23 A Yes. It kind of goes through the whole month
24 of August, it looks like.

25 Q Right. So if you turn to the next page on

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1 September 15, 2017, it says, "iReady diagnostic ends"?

2 A Yes.

3 Q So this calendar would let GNETS directors
4 know that August 7th to September 15th was the window
5 that programs had to administer the iReady diagnostic
6 to GNETS students?

7 A Yes.

8 Q Am I correct that on the August 2017 page of
9 the calendar, there are also instructions for how to
10 use the iReady diagnostics?

11 A Yes.

12 Q If you turn to October 2017, am I correct that
13 the October and November 2017 calendars show the window
14 for GNETS programs to administrator the SDQ tests?

15 A Yes.

16 Q That window was October 16th to November 3rd?

17 A Yes.

18 Q The November 2017 calendar page also shows the
19 window for GNETS programs to administer the BASC-3; is
20 that right?

21 A Correct.

22 Q Am I correct that on the October 2017 calendar
23 page, there are instructions for conducting emotional
24 and behavioral screening?

25 A Yes.

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1 Q Those instructions tell how the SDQ and the
2 BASC-3 should be used, among other things?

3 A Yes.

4 Q This calendar that you attach in your email to
5 Ms. Cleveland contains other dates for other
6 assessments and for professional learning, correct?

7 A Correct.

8 Q It also includes the dates for when GNETS
9 programs should complete their midyear strategic plan
10 self-assessment?

11 A Yes.

12 Q And their end of year strategic plan
13 self-assessment?

14 A Correct.

15 Q It also includes the window for when visits
16 for the strategic plan reviews begin and end; is that
17 right?

18 A Yes.

19 Q Did Ms. Cleveland enlist your help in updating
20 this calendar after you sent it to her so that it could
21 be used for the upcoming 2018-2019 school year?

22 A I do not recall.

23 MS. GARDNER: I'd like to have this marked as
24 Plaintiff's Exhibit 500.

25 (Plaintiff's Exhibit 500 was marked for

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1 identification.)

2 (Witness reviewing document.)

3 BY MS. GARDNER:

4 Q You have been handed Plaintiff's Exhibit 500.
5 This is an email thread between you and Vickie
6 Cleveland. The most recent email was sent by you to
7 Vickie Cleveland on June 14, 2018 with a subject Re:
8 Suggestion. The first page of this document is Bates
9 stamped GA00326259.

10 Ms. Wolf, does this email refresh your
11 recollection as to whether Ms. Cleveland enlisted your
12 help in updating the calendar for use for the 2018-2019
13 school year?

14 A It does.

15 Q Did she make that request?

16 A She did.

17 Q Did you help her update the calendar for the
18 2018-2019 school year?

19 A I did.

20 Q Was a similar calendar given to GNETS
21 directors for the 2018-2019 school year?

22 A Yes.

23 Q Do you have a calendar like this for the
24 current school year?

25 A No.

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1 Q When did you last receive a calendar like
2 this?

3 A I believe that was the last year we received a
4 calendar.

5 Q Do you still operate on a schedule for
6 administering iReady diagnostics?

7 A Yes.

8 Q How do you know the window for administering
9 iReady diagnostics?

10 A I'm not sure if we get -- I think when we have
11 our directors meetings, those dates are posted in the
12 PowerPoint but it's not given in a calendar format that
13 I have seen.

14 Q But you receive it through the GNETS directors
15 meetings?

16 A Yes.

17 Q Do you still operate on a schedule for
18 administering the SDQ?

19 A Yes.

20 Q Do you still operate on a schedule for
21 administering the BASC-3?

22 A Yes.

23 Q Do you receive the dates for administering the
24 SDQ and the BASC-3 similarly in GNETS directors
25 meetings?

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1 A Yes.

2 Q Who do those dates come from?

3 A Vickie Cleveland and Lakeisha Stevenson.

4 Q Does GNETS of Oconee submit its SDQ results to
5 the Georgia Department of Education?

6 A We do not submit them, no. We keep them as
7 part of our strategic plan artifacts.

8 Q Those strategic plan artifacts are reviewed --
9 let me rephrase that. Are those strategic plan
10 artifacts reviewed at any point in the strategic plan
11 and self assessment process?

12 A Yes.

13 Q Who reviews those artifacts?

14 A We review them at a GNETS local level with our
15 leadership team and they are available should the State
16 want to come in and review our artifacts for the
17 strategic plan.

18 Q Was there a time when GNETS of Oconee
19 submitted its SDQ results to the Georgia Department of
20 Education?

21 A I do not recall.

22 MS. GARDNER: I'd like to have this marked as
23 Plaintiff's Exhibit 501.

24 (Plaintiff's Exhibit 501 was marked for
25 identification.)

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1 (Witness reviewing document.)

2 BY MS. GARDNER:

3 Q Ms. Wolf, you have been handed Plaintiff's
4 Exhibit 501. This is an email from you to Vickie
5 Cleveland dated November 30, 2020. The subject is File
6 Reviews. The Bates stamp on this document is
7 GA00364299.

8 Am I correct that in this email you write to
9 Vickie, quote, "I know that you wanted our files done
10 by November 30, 2020, but I have been swamped with
11 several meetings and am only about a third of the way
12 through. I'm trying to do ten a day, but that has been
13 nearly impossible with everything else."

14 Did you write that?

15 A I did.

16 Q What are the file reviews that you are
17 discussing here?

18 A We were asked to go through every single
19 student file and identify when that student was
20 initially referred, whether they had a behavior
21 intervention plan when they came to us, I believe
22 whether they had a psychological within three years.

23 I'm trying to think of what other data was on
24 there. It was several items that had to be answered
25 for each file we reviewed. So it was a timely process

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1 because it was doing some research.

2 Q Who asked you to do that?

3 A Vickie Cleveland.

4 Q What did Ms. Cleveland say to you if anything
5 about why she was asking you to do that?

6 A I know it was all part of the lawsuit. I
7 don't know specifically what it was for, but I know it
8 was pertaining to the lawsuit.

9 Q How much time were you given to go through
10 those files and provide that information?

11 A I believe that they gave us, we had an initial
12 meeting in the fall of that year which would have been
13 in 2020. And, you know, we were given a couple months
14 to do it.

15 MS. GARDNER: I'd like to mark this as
16 Plaintiff's Exhibit 502.

17 (Plaintiff's Exhibit 502 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q Ms. Wolf, you have been handed Plaintiff's
22 Exhibit 502. This is the GNETS of Oconee midyear
23 Strategic Plan Review and the first cover page says
24 January 14, 2021 Update for GLRS Collaborative
25 Community.

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1 Do you recognize this document?

2 A I do.

3 Q What is this?

4 A This is, I give two updates a year, actually
5 three updates a year to the Georgia Learning Resources
6 Services under Oconee RESA, so just giving them an
7 update on our strategic plan, what our outcome ratings
8 were and the services provided.

9 Q And so when you say Georgia Learning Resources
10 System?

11 A System, Services. Georgia Learning Resources,
12 I don't know if it is Services or Systems.

13 Q But that is why it is called GLRS?

14 A Yes.

15 Q Is that a division of Oconee RESA?

16 A Yes, there's a GLRS, they used to be separate
17 entities but now they are under RESA's.

18 Q This document also does not have page numbers
19 so I am going to ask if you can turn to, start from the
20 end and turn back eight pages.

21 A Okay.

22 Q There is a page entitled GNETS File Reviews?

23 A Here we go. Yes.

24 Q Does this page refresh your recollection as to
25 what information the State Department of Education

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1 required for the files that you reviewed and that we
2 discussed in connection with the last email,
3 Plaintiff's Exhibit 501?

4 A It does.

5 Q What information was requested?

6 A The initial date, referral date, prior
7 services before GNETS, the FBA and behavior
8 intervention plan dates, psychological within three
9 years and then prior documentation showing that last
10 less restrictive options have been exhausted.

11 Q Did you eventually provide that requested
12 information to the State Department of Education?

13 A I did.

14 Q If you turn three pages towards the end of
15 this document to the page that says Update on Possible
16 GNETS Facility.

17 A Yes.

18 Q This references a GNETS facility possibly
19 located in Baldwin in building an alternative school.
20 What building is being referred to here in Baldwin
21 County?

22 A It is a building that's not in existence.
23 They are considering or were at the time considering
24 building a facility that would serve the Baldwin
25 Success Academy and on the other side, GNETS.

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1 Q So this was consideration of new construction
2 for a GNETS center and then also the Baldwin County
3 Success Academy?

4 A Correct.

5 Q Were the funding concerns that are identified
6 here related to the fact that it would be a new
7 facility?

8 A Yes, and whether the systems would be
9 interested in coming into Baldwin to participate in
10 that project.

11 Q When you say whether the systems would be
12 interested in coming into Baldwin to participate in the
13 project, are you referring to the systems being
14 interested in coming into Baldwin with money for the
15 project or physically bringing their students into
16 Baldwin County?

17 A Both.

18 Q If you turn to the next page, there is
19 discussion of center to school-based model.

20 Do you see that?

21 A Yes, I do.

22 Q This notes that disciplinary referrals have
23 increased by 61 percent and suspensions have increased
24 by 59 percent.

25 Do you see that?

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1 A Yes.

2 Q What do you attribute those increases to?

3 A I think that there are several factors, but I
4 think that the schools that we have our classrooms in
5 are not used to the level of severity of the kids that
6 we serve.

7 Our students before were served in a main
8 center environment and it was a therapeutic setting and
9 a main school setting our students are running up to
10 the cafeteria, to the front office, cursing out
11 parents. It's chaotic in many cases. So that's where
12 the increases in suspensions and disciplinary referrals
13 have come from the systems that we serve.

14 Q GNETS of Oconee students and the school-based
15 model are still being served by GNETS of Oconee
16 teachers; is that right?

17 A That is correct.

18 Q Are those the teachers who are issuing these
19 disciplinary referrals and suspensions?

20 A In many cases, no, they are coming from the
21 school systems.

22 Q How does that relationship work?

23 A In terms of the school administration? You
24 know, basically, it's communication between the GNETS
25 program and the school administrators and me. And the

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1 systems in many cases have grave concerns about the
2 severe behaviors of our students being served in their
3 systems, their schools.

4 Q What is your view about how those grave
5 concerns should be addressed?

6 A In my professional opinion, I feel like our
7 students benefit from a therapeutic program and a
8 therapeutic milieu where everyone in the building
9 understands crisis and can support each other and best
10 support those students.

11 Q In your professional opinion, would students
12 who are served in a school-based model within GNETS of
13 Oconee have better outcomes if there were more
14 therapeutic staff available to support them within that
15 setting?

16 A That's very possible.

17 Q Do I understand that that is not a realistic
18 option because of budget considerations at this point?

19 A It's not only -- it is budget considerations
20 as part of it, but it's the severity of the students,
21 is the other part of it.

22 Q So when you say the severity of the students
23 is the other part of it, there is some concern that
24 even if you had additional therapeutic staff,
25 sufficient staff so you had therapeutic staff at every

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1 site a hundred percent of the time, that those students
2 would not be able to be supported within a school-based
3 model?

4 A I am just picturing some of our kids that even
5 with the therapeutic staff there, particularly our
6 runners that try to run up and harm others or run up to
7 the, run out through the parking lot, things like that,
8 even though you have those therapeutic staff there,
9 they are still running through the classrooms through
10 all of the students.

11 And not only is it very scary for the students
12 in the Gen Ed classrooms and the parents that are
13 bringing their kids in, it is very overwhelming for our
14 kids that are in crisis and, you know, it's a huge
15 setting.

16 They run in the cafeteria. There's 300 kids.
17 They get overwhelmed and go into crisis.

18 So yes, you can have as many therapeutic staff
19 as you want, it's still not the best situation for our
20 students, in my opinion. In fact, it's traumatic.

21 Q You note in the third bullet point on this
22 page, "Many students have gone from full day placements
23 to part day or part week because the larger school
24 environment is disrupted when they are in crisis or
25 acting out."

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1 Do you see that?

2 A Yes.

3 Q Is this consistent with what we discussed
4 earlier in terms of the sort of effort of when to
5 alternate the students in classes and to thin out
6 numbers and provide a better environment in terms of
7 the number of students in each classroom?

8 A Yes.

9 Q This also says, "In almost every school-based
10 setting, our students have to eat in their classroom
11 because of the disturbance they cause in the lunch room
12 and hallways."

13 Is that accurate?

14 A Yes, it is.

15 Q Is there any school-based setting within GNETS
16 of Oconee where students are eating in the lunch room?

17 A We have tried it a couple of times in various
18 places. There's some students that are able to eat at
19 the high school location. At our middle school, not
20 right now; not at Lakeview; Putnam, yes, they do eat, I
21 think, in their lunch room; Wilkinson, no; Washington,
22 no; and Johnson, yes.

23 Q Turning to the next page which says Advantages
24 of Center-Based, the notes in the second bullet point,
25 "The therapeutic milieu allows for staff to effectively

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1 intervene when there is a crisis on site as opposed to
2 relying on parent pickups or EMS."

3 Do you see that?

4 A Yes.

5 Q Would you just share your definition of the
6 therapeutic milieu?

7 A Yes. So my definition of the therapeutic
8 milieu is where every staff member is trained in
9 positive interventions and therapeutic supports. So if
10 a crisis occurs with the receptionist or bus personnel
11 or whatever the case scenario, that every single person
12 is trained how to deescalate that in an appropriate
13 way.

14 Q At the time you prepared this, were
15 school-based locations relying on parent pickup or EMS
16 when a student had a crisis?

17 A Yes.

18 Q Was that true across all of your sites or are
19 there particular sites where that is more frequently a
20 problem?

21 A Pretty much across the board in all of our
22 sites.

23 Q This references EMS. What is EMS?

24 A Emergency medical services.

25 Q What has been the role of EMS in crisis

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1 situations as you are referencing it here?

2 A When a student is in a mental health crisis
3 and is dangerous to themselves or others in an extreme
4 way, we would involve EMS to transport to the emergency
5 room for evaluation for possible crisis stabilization.

6 Q Have you been present at any of your sites
7 when EMS has had to intervene?

8 A I have.

9 Q Can you just describe for us sort of what that
10 looks like, how EMS is able to get a student under
11 control to be able to transport them? What does that
12 look like?

13 A I'm trying to think of a particular. In one
14 situation a student was suicidal. He was extremely
15 upset.

16 He ran out into the parking lot, ran down the
17 crosswalk where the bus ramp was saying he was going to
18 run up in traffic and kill himself. He was like a
19 fifth grade student so he was a pretty tall student. I
20 was there.

21 I was helping contain him. Another staff
22 member came out to help contain him. The resource
23 officer came out and he wouldn't calm down and he was
24 continuing to make threats to harm others, to kill
25 himself, banging his head.

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1 And we made a decision, the principal came out
2 and we made a decision that EMS needed to be contacted.
3 And so EMS came up.

4 We were involved in, we were holding him. And
5 the resource officer, I'm not sure how he contained him
6 or got him in the ambulance, but he was able to get him
7 into the ambulance and be taken to the emergency room.

8 Q Was the student restrained in order to be put
9 into the ambulance?

10 A Yes.

11 Q Does EMS ever use any sort of medical sedative
12 for students when they are called?

13 A I have never seen them use a medical sedative.

14 MS. GARDNER: We have been going more than an
15 hour. Want to take a break?

16 MR. NGUYEN: Sure.

17 THE VIDEOGRAPHER: We are off the record at
18 4:41 p.m.

19 (Recess.)

20 THE VIDEOGRAPHER: We are back on the record
21 at 4:50 p.m.

22 BY MS. GARDNER:

23 Q We talked a little bit intermittently about
24 funding. What is GNETS of Oconee's operating budget
25 for this 2022-23 fiscal year?

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1 A I don't know the exact amount.

2 Q Ballpark?

3 A Ballpark, I really don't, I don't even know,
4 like 250,000. I'm not really sure.

5 Q You think it's about 250,000?

6 A I really don't know. I'm sorry.

7 Q Are you familiar with the GNETS strategic
8 plan?

9 A Yes.

10 Q What is the GNETS strategic plan?

11 A The GNETS strategic plan is basically a
12 program improvement plan where there are several
13 components that we put in place, academic, behavioral,
14 fiscal, supervision-wise that we put in place and
15 ensure that all those elements are carried out.

16 Q Is GNETS of Oconee obligated to comply with
17 the GNETS strategic plan?

18 A We are.

19 Q Does the strategic plan have an assessment
20 component?

21 A In each of the areas, yes, it does.

22 Q How does the assessment process work
23 generally?

24 A So in terms of the academic part, there's an
25 assessment required for state-mandated assessment. Of

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1 course, we are going to comply with all of those
2 guidelines.

3 In the behavior assessment part, it is
4 completing the behavior assessment system for children
5 as well as an assessment for students with autism and
6 the strengths and difficulties questionnaire and then
7 the iReady assessments, of course.

8 Q I realized that my question might have been a
9 little confusing. When I say an assessment process, is
10 there a process for assessing compliance with the GNETS
11 strategic plan?

12 A I understand. So there's an outcome summary.
13 We go through each of the elements and rate ourselves
14 as whether we are fully operational or less than
15 operational, satisfactory, so forth, not operational or
16 there's not evidence, you know, the evidence isn't
17 there. So it would be a not evidence rating.

18 I believe it is on a scale of 3, 2, 1, 0.

19 Q When you say, "we rate ourselves," you are
20 talking about the GNETS program?

21 A Yes, the GNETS leadership team.

22 Q Once that self-assessment is done, is there an
23 on-site review from someone at the State Department in
24 connection with the self-assessment process?

25 A Yes, so typically we do a midyear assessment

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1 and they are not involved in the midyear assessment but
2 they are involved in the end of year assessment.

3 Q What happens with the on-site reviews by the
4 State Department of Education?

5 A It varies from year to year. This year, the
6 on-site review was done online and we went through the
7 components of the strategic plan and they looked at
8 artifacts, those kind of things.

9 Q During those reviews, do you receive any sort
10 of feedback?

11 A Yes.

12 Q What kind of feedback?

13 A If there wasn't enough evidence to support
14 that particular rating, suggestions would be made on
15 what else would need to occur, things like that.

16 Q Do you ever receive requests from the State
17 Department of Education during the reviews for GNETS of
18 Oconee to provide more documentation to them?

19 A In terms of the review, I have not had to, but
20 I kind of go over the top with my collection of
21 artifacts, so there might be other programs that have
22 to provide more.

23 Q Who from the State Department of Education
24 conducts the reviews?

25 A Vickie Cleveland completed this year's along

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1 with Lakeisha Stevenson.

2 MS. GARDNER: I'd like to have this marked as
3 Plaintiff's Exhibit 503.

4 (Plaintiff's Exhibit 503 was marked for
5 identification.)

6 (Witness reviewing document.)

7 BY MS. GARDNER:

8 Q Ms. Wolf, you have been handed what's been
9 marked as Plaintiff's Exhibit 503. This is an email
10 thread between you and Deborah Gay. The most recent
11 email in the thread, you sent to Deborah Gay on
12 December 31, 2015. The subject is As Requested.

13 It contains one attachment which is a
14 Microsoft Word document with the file name GNETS
15 Strategic Plan Year 4 Recommendations from Wolf. The
16 first page of this document is Bates stamped 00403823.

17 Do you recognize this?

18 A I do.

19 Q Am I correct that you are sending this email
20 in response to a prior email from Ms. Gay and what she
21 says, "I would appreciate your review of the attached
22 updated GNETS strategic plan for accuracy and to
23 include any additional information you may have."

24 A Yes.

25 Q Who is Deborah Gay?

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1 A Deborah Gay was the director of the special
2 education services and support for the Department of
3 Education and that was in 2015.

4 Q In your email you say you highlighted your
5 recommendations in yellow and put some comments in red
6 in the strategic plan that you attach in your email to
7 Ms. Gay?

8 A Yes.

9 Q Turning to the attachment, turn to Page 3 of
10 the attachment which has the section on program
11 operation on it.

12 A Yes.

13 Q Do you see it says just beneath that, "The
14 GaDOE provides to each GNETS program, GNETS fiscal
15 agent, local school district, and other stakeholders a
16 GNETS program operations manual that clearly describes
17 program responsibilities and fiscal operations."

18 A Yes.

19 Q "This manual is designed to ensure that GNETS
20 programs operate efficiently, effectively and
21 consistently throughout the network to support local
22 school districts in providing students with educational
23 opportunities that will enable them to become college
24 and career ready."

25 Do you see that?

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1 A I do.

2 Q As director of the GNETS program, did you
3 receive one of the operations manuals referenced here?

4 A Yes.

5 Q Do you still receive such operations manuals?

6 A The operations manual is online. It hasn't
7 been updated for a number of years.

8 Q Do you still refer to the operations manual in
9 any way?

10 A I don't, no.

11 Q If you turn to the next page, Page 4, just
12 above Goal 2 it says, "GaDOE will collaborate with
13 interagency partners (i.e., the Department of
14 Behavioral Health and Developmental Disabilities) to
15 ensure that eligible GNETS students have access to
16 mental health services through a system of care."

17 Do you see that?

18 A Yes.

19 Q What did you understand this to mean?

20 A That our students would benefit from the
21 system of care and ensuring that they are getting the
22 highest level of services needed.

23 Q What is the system of care?

24 A It is a system of different agencies and
25 service providers that are available in the community

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1 for students with mental health needs.

2 Q Based on your experience as a director of a
3 GNETS program, what is your opinion on the adequacy of
4 the system of care that exists for your GNETS students?

5 A I don't think it reaches all students. I
6 think that our very top tier students that are brought
7 before the local interagency planning team, I believe
8 that those students get the help that they need because
9 those system of care providers are at that interagency
10 meeting.

11 Do I think our students need more?
12 Absolutely.

13 Q When you say your students need more, do you
14 have specific or can you identify specific ways that
15 you think the system of care should be improved so that
16 your students have that more that they need?

17 A I think that there are intense mental health
18 needs of our students at school and in the community
19 and in their homes that they are not getting.

20 Q What would be required to ensure that students
21 are getting services for those intense mental health
22 needs?

23 A Well, there was a time when there was
24 intensive community support called CSII, Community
25 Support Intensive Intervention, I believe. And I don't

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1 see that. I haven't seen that in the past couple
2 years.

3 Q Do you have any understanding of why that
4 hasn't been existing in the last few years?

5 A A lot of it is, well, staffing patterns,
6 staffing issues, inability to keep staff as well as
7 COVID put everybody online. And you still have DFACS
8 still working online and some mental health providers
9 working online with kids. So I think that's where it
10 became, broke down a bit.

11 Q If you turn to Page 6, the row that's Row
12 Number 7, it is identifying an action step to "develop
13 formal agreements with interagency partners to ensure
14 that students receive mental health services through a
15 system of care."

16 Do you see that?

17 A Yes.

18 Q And then the data in the second column from
19 the far right related to that action step says "formal
20 agreements."

21 A Yes.

22 Q And what formal agreements are those referring
23 to?

24 A The formal agreements that I know about are
25 agreements or memorandums of understanding between

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1 River Edge and GNETS, and this is for our program
2 specifically, Oconee Center has an agreement. But I
3 haven't seen any agreement through a system of care. I
4 don't know what that looks like.

5 Q You said GNETS of Oconee does have a
6 memorandum of agreement with River Edge?

7 A Yes.

8 Q What's contained in that memorandum of
9 agreement?

10 A I'm not really sure what's contained in it. I
11 know there's something about collaboration. I don't
12 know specifically what else is, respecting
13 confidentiality, those kind of things.

14 Q Is there also a memorandum of agreement with
15 Oconee Center?

16 A Yes.

17 Q Does GNETS of Oconee have any memoranda of
18 agreement with any other community or mental health
19 agencies?

20 A Pure Heart Behavioral and Benchmark Behavioral
21 Health Services and also with the Georgia College and
22 State University Music Therapy Collaborative.

23 Q Excellent. Thank you.

24 Moving to Page 10 which contains a section on
25 accountability, do you see that?

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1 A Yes.

2 Q Just above Goal 6, the last sentence there
3 says, "Annually, the GaDOE will provide GNETS directors
4 a performance summary for each program with data
5 gathered through the program level file at the GaDOE."

6 Do you see that?

7 A Yes.

8 Q Do you have experience with the program level
9 file referenced here?

10 A Yes.

11 Q What is that program level file?

12 A The program level file shows the number of
13 students that are served in the GNETS program.

14 Q Does that file contain any other information?

15 A Student services through the IEP is all I know
16 of.

17 Q Did you submit that sort of program level file
18 to the Georgia DEO on behalf of GNETS of Oconee?

19 A No, the school systems are the ones that pull
20 the program level file report.

21 Q Have you ever received the performance summary
22 that's referenced here?

23 A I'm not sure what that's speaking of. You
24 know, we're going back a number of years now. Before
25 the strategic plan, we did have that information, but I

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1 haven't seen it since the strategic plan.

2 Q To be clear for the record, this is a very
3 early version of the GNETS strategic plan, correct,
4 many years ago?

5 A Yes.

6 MS. GARDNER: I'd like to have this document
7 marked as Plaintiff's Exhibit 504.

8 (Plaintiff's Exhibit 504 was marked for
9 identification.)

10 (Witness reviewing document.)

11 BY MS. GARDNER:

12 Q You have been handed what's been marked as
13 Plaintiff's Exhibit 504. This is an email from you to
14 Nakeba Rahming dated February 1, 2016. The subject is
15 Rubric and there's one attachment that is a Microsoft
16 Word document with the file named GNETS Standards of
17 Practice Rubric - Draft. This email is Bates stamped
18 GA00062023.

19 Do you recognize this email?

20 A Yes, I do.

21 Q In this email am I correct that you say, "The
22 attached is a draft rubric that was developed by
23 Jeannie Morris and the directors in May of 2014 that
24 addresses each of the Standards of Practice. It may be
25 useful as we move forward to develop the strategic

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1 plan."

2 A Yes.

3 Q Who is Jeannie Morris?

4 A Jeannie Morris was a fellow GNETS director
5 from the Cedarwood Academy.

6 Q When you say that the attached draft rubric
7 addresses each of the standards of practice, what
8 standards of practice are you referring to?

9 A So at that time we had standards of practice
10 of what was recommended for each GNETS program to have
11 for their program accountability measures.

12 Q Were those standards of practice first
13 identified in the draft rubric or did they preexist the
14 rubric?

15 A They preexisted the rubric.

16 Q When were those standards of practice
17 developed?

18 A It's hard to say. It was a couple of years
19 before this, so we're talking around 2010 maybe.

20 Q Who developed the standards of practice?

21 A We developed them as GNETS directors.

22 Q Did the State Department of Education
23 participate in that process?

24 A I believe so.

25 Q If you recall, who from the State Department

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1 of Education was involved?

2 A I don't recall specifically who was involved
3 with the standards of practice. Terry, what was
4 Terry's last name, he was the prior GNETS program
5 manager. Susan Mackenzie, it's been a while ago. So
6 prior to Virginia O'Connell.

7 Q I want to take a look at the attached rubric.
8 Am I correct in understanding that the rubric
9 identifies the various standards of practice along the
10 far left column?

11 A Yes.

12 Q And that it contains indicators for how well a
13 GNETS program is demonstrating that standard of
14 practice; is that right?

15 A That's correct.

16 Q So a GNETS program can either be in the
17 efficient category, the needs development category or
18 the ineffective category?

19 A Correct.

20 Q For each standard of practice, there are
21 indicators identified that would tell someone where a
22 GNETS program faults on the scale of proficient, needs
23 development or ineffective, right?

24 A Correct.

25 Q So, for example, on the first page of the

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1 rubric, one of the indicators of proficiency in the
2 standard practice label instruction and grade level
3 Georgia Standards of Excellence is that, "All teachers
4 are skilled in implementing research-based strategies
5 which help support students' success with the
6 curriculum despite academic deficits."

7 A Yes.

8 Q And another indicator of proficiency in that
9 standard of practice is that, "The GNETS programs can
10 demonstrate a trend toward increased proficiency on
11 statewide assessments."

12 A Yes.

13 Q And then there are indicators listed on the
14 other end of the spectrum that suggest ineffectiveness
15 in the standard of practice labeled instruction and
16 grade level Georgia Standards of Excellence, correct?

17 A Correct.

18 Q One of those indicators of ineffectiveness is
19 that teacher observations reveal minimal knowledge of
20 content or teaching pedagogy?

21 A Correct.

22 Q This process of having indicators is repeated
23 further in the standard of practice, right?

24 A Yes.

25 Q Are you familiar with the APEX program?

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1 A Yes.

2 Q What is the APEX program?

3 A The APEX program, I'm not sure if it is
4 grant-funded, but it is a mental health program that
5 comes through either Oconee Center or River Edge in our
6 area. And there are counselors that are assigned to
7 the school to work with students on mental health
8 needs.

9 Q Do any GNETS of Oconee students access APEX
10 services?

11 A Yes.

12 Q How many GNETS of Oconee students accessed
13 APEX services in the 2021-22 school year?

14 A And this is approximate, I'm going to say
15 approximately ten.

16 Q Are those ten students located in a particular
17 GNETS site or do they span all of the GNETS sites?

18 A They span most of the GNETS sites.

19 Q How do GNETS of Oconee students access APEX
20 services?

21 A There's an APEX referral.

22 Q Does GNETS of Oconee have the ability to refer
23 its students to APEX?

24 A Yes.

25 Q How does that process work?

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1 A We complete the referral and send it to
2 whichever program that houses the APEX program. It's
3 swapped back and forth between Oconee Center and River
4 Edge. So they receive the referral and the APEX
5 counselor at the school-based site will get in touch
6 with the GNETS person and then arrange services.

7 Q Did GNETS of Oconee have the ability to refer
8 students to APEX services when it was using the
9 center-based model?

10 A I don't recall when we were in the
11 center-based model that they had the APEX program in
12 place. We did at that time, we did have mental health
13 counselors that came out to the center to work with
14 students from both those facilities.

15 MS. GARDNER: I'd like to mark this document
16 as Plaintiff's Exhibit 505.

17 (Plaintiff's Exhibit 505 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q This is an email from you to Lakeisha
22 Stevenson dated November 12, 2019. The subject is Re:
23 GNETS/APEX and this email is Bates stamped GA00953836.
24 Do you recognize this email?

25 A Yes. I don't remember it, though, but yes.

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1 Q This email that you sent to Ms. Stevenson is
2 in response to an earlier email asking the question,
3 "How many students have received mental health services
4 via APEX?"

5 A Yes.

6 Q You write to Ms. Stevenson and say, "Of the
7 six counties we serve, we only have one student in
8 Johnson County served by APEX."

9 Is that right?

10 A At that time, yes.

11 Q So in 2019, you had one student served by
12 APEX?

13 A Yes.

14 Q I think you said as of last school year, the
15 ballpark number was approximately ten GNETS of Oconee
16 students?

17 A Yes.

18 Q For GNETS of Oconee students who receive APEX
19 services, approximately how often do they receive those
20 counseling services in terms of frequency?

21 A This is a guess, about once a week.

22 Q Do you currently have GNETS of Oconee students
23 accessing APEX services this year, this school year?

24 A Yes, I believe so.

25 Q Approximately how many students?

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1 A So far this year, I know that we have made two
2 or three referrals.

3 Q When you make a referral to APEX, is it
4 automatic that the student will receive counseling
5 services or is there some sort of process the student
6 has to go through to be approved and accepted into
7 APEX?

8 A I don't believe it is automatic approval. I
9 believe they have to get parent permissions and things
10 like that first before they can start intervening with
11 students.

12 Q Do the general education settings that refer
13 students to GNETS of Oconee have social workers on site
14 in their buildings?

15 A I don't know if they have social workers.
16 They have counselors and I know there's a school-wide
17 social worker. But I don't think the local schools
18 have a social worker assigned.

19 Q The referring county schools do have
20 counselors on site in their facilities?

21 A Yes.

22 Q When you say counselors, are you referring to
23 guidance counselors or more of a therapeutic counselor?

24 A More of a therapeutic counselor. They also
25 have behavior interventionists.

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1 Q What about psychologists?

2 A Not at the school level.

3 Q Do GNETS of Oconee teachers receive training
4 on standards-based instruction?

5 A They did not this year. They are familiar and
6 they are required to post the Georgia Standards of
7 Excellence but many of our teachers are not fully
8 consent certified and so they are all, all of them
9 right now are operating with an online program that
10 has, that it is a graded program. They are following
11 the Georgia Standards of Excellence.

12 Q When you say they are operating with an online
13 program that is a graded program, is that an online
14 training program?

15 A No, for example, Edgenuity, your typical
16 middle and high school students are taking all of their
17 subjects through Edgenuity so through completing those
18 assignments and quizzes and post-tests and end of year
19 tests, that's where the grade is obtained.

20 Q By utilizing the online program, is that an
21 assurance that the instruction students are receiving
22 is standards-based?

23 A Yes.

24 Q When you say that a lot of your teachers are
25 not yet content-certified, what do you mean by that?

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1 A So a high school class, the students in their
2 class are going to range from all of the required 21
3 classes that they would be getting to get their high
4 school diplomas and so they are not content-certified
5 in history, math, language arts and so forth.

6 Q So am I understanding correctly that a teacher
7 who is not content-certified in a particular area,
8 doesn't necessarily have the tools to teach a
9 standards-based class in that area? Is that an
10 accurate understanding of the content certification?

11 A They don't have a full, deep knowledge of the
12 content that's required for that standard for that
13 particular subject. There are numerous standards that
14 come along with it and they may not have that deep
15 content certification that they passed an assessment on
16 to get content-certified.

17 So they do have access and review the
18 standards and things like that, but they don't have
19 that content assessments.

20 Q Is that lack of content certification a driver
21 of the use of those online platforms like Edgenuity?

22 A Yes.

23 MS. GARDNER: I'd like to mark this document
24 as Plaintiff's Exhibit 506.

25 (Plaintiff's Exhibit 506 was marked for

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1 identification.)

2 (Witness reviewing document.)

3 BY MS. GARDNER:

4 Q You have received Plaintiff's Exhibit 506.
5 This is an email from Vickie Cleveland to you dated
6 December 19, 2017. The subject is iReady Data Week
7 ending 12-8-2017. It contains two attachments. The
8 Bates stamp of this email is GA00014432.

9 Do you recognize this email?

10 A I do.

11 Q Am I correct that in this email Ms. Cleveland
12 is forwarding you certain iReady reports for GNETS of
13 Oconee?

14 A Can you repeat that question? I'm sorry.

15 Q Am I correct that in this email Ms. Cleveland
16 is forwarding you certain iReady reports for GNETS of
17 Oconee?

18 A Yes.

19 Q There is a report for ELA and a report for
20 math, correct?

21 A Correct.

22 Q Ms. Cleveland says in her email to you, "As
23 you review your data each week, reminder to look for
24 the following accountability reports:" and then she
25 starts with usage. And it says, "looking for students

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1 to accomplish more than or equal to 45 minutes per week
2 per subject, 90 minutes."

3 Do you see that?

4 A Yes.

5 Q Is that the minimum usage of 90 minutes that
6 we discussed earlier?

7 A Yes.

8 Q She then goes on to say, "Pass rate," and it
9 says, "look for 70 percent and above - will be sent by
10 Curriculum Associates."

11 A Yes.

12 Q What does that mean?

13 A So Curriculum Associates will consolidate the
14 data for our students using the iReady program and send
15 it to us.

16 Q What does it mean, to look for 70 percent and
17 above?

18 A So on their totalling all of the quizzes that
19 the student has taken, that it would be at 70 percent
20 or above pass rate.

21 Q That's the standard that you should be using
22 when you are looking at your data?

23 A Yes.

24 Q Moving to the very last bullet it says,
25 "reviewing usage reports goal," and it says,

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1 "80 percent of students with greater than or equal to
2 45 minutes per week per subject."

3 This is communicating that the target you
4 should be looking for in terms of the number of
5 students who are hitting that minimum usage is
6 80 percent of your students?

7 A Correct.

8 Q In the next paragraph, Ms. Cleveland is
9 discussing more about your specific data. She says in
10 the middle of that paragraph, "The expectation is that
11 there will be growth at the student and system level.
12 GaDOE will be reviewing three-year trend data from the
13 midyear and end-of-year reports provided by Curriculum
14 Associates."

15 What did you understand that to mean?

16 A That not only our program but it would take
17 the program from all the programs together and review
18 that data and see where the trend is and where the
19 problem areas are.

20 Q The State Department of Education was
21 expecting that there would be growth for individual
22 students but then also across the system as a whole?

23 A Yes.

24 Q What is an iReady transfer request?

25 A When a student moves into another GNETS

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1 program, they may have been assigned an iReady log-in
2 with their GTID. And when you try to enter them in as
3 a new student in the iReady, it's not going to let you
4 put that GTID in because it's already assigned to
5 another system. So you would contact iReady or contact
6 Lakeisha Stevenson through the secure portal and ask
7 for that student to be transferred.

8 So the Department of Education has all of our
9 GNETS program listed under one iReady site. So she
10 makes those transfers.

11 Q What are the consequences of a student being
12 unable to be transferred in iReady?

13 A There would never be a consequence where you
14 couldn't be transferred. You know, as soon as they
15 come into the program, you are putting them into the
16 iReady program.

17 You can't get them in, so you write to her.
18 And she immediately transfers them to the program.

19 Q But I take it until the student is
20 transferred, they can't use iReady?

21 A Correct.

22 Q Are there any students at GNETS of Oconee who
23 have been screened for gifted services in the last few
24 years?

25 A Not that I know of, no.

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1 Q Do you know of any GNETS of Oconee students
2 who have been screened for gifted services at any point
3 during your tenure with GNETS of Oconee?

4 A We have had students that have had gifted
5 services before, yes.

6 Q How long ago was that?

7 A The student that I'm thinking of has already
8 graduated so it's been several years ago.

9 Q I take it no GNETS of Oconee students are
10 currently receiving gifted services?

11 A No.

12 Q Are any GNETS of Oconee students currently
13 enrolled in AP or honors courses?

14 A No.

15 Q Have any GNETS of Oconee students been
16 enrolled in AP or honors courses in the last five
17 years?

18 A Not that I know of.

19 MS. GARDNER: I'd like to have that marked as
20 Plaintiff's Exhibit 507.

21 (Plaintiff's Exhibit 507 was marked for
22 identification.)

23 (Witness reviewing document.)

24 BY MS. GARDNER:

25 Q You have been handed Plaintiff's Exhibit 507.

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1 This is an email from you to Vickie Cleveland with a
2 copy to Joanna Mock. The subject is "Forward: GNETS
3 meeting info/info needed."

4 There is one Excel attachment. And this was
5 sent on September 14, 2018. The Bates stamp on this
6 document is GA00332753.

7 In this email you are forwarding to Ms.
8 Cleveland data from GNETS of Oconee that it looks like
9 was requested; is that right?

10 A Yes.

11 Q If you can just turn to the attachment, am I
12 correct that the attachment shows current enrollment in
13 GNETS of Oconee by site as of September 14, 2018?

14 A Yes.

15 Q It also shows the FY17-18 graduates from GNETS
16 of Oconee?

17 A Correct.

18 Q And there are three graduates in that fiscal
19 year?

20 A Yes.

21 Q It shows transitioning students and identifies
22 four students there?

23 A Yes, that fully transitioned out, yes.

24 Q It says six students participated in
25 extracurricular activities, correct?

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1 A Correct.

2 Q That's eight percent of GNETS of Oconee
3 students?

4 A Yes.

5 Q What is the current level of participation of
6 GNETS of Oconee students in extracurricular activities?

7 A I don't know the exact percentage. I know we
8 have several students that play basketball, football,
9 those kind of things.

10 Q Is the percentage somewhere in the range of
11 what's reflected in this particular document?

12 A I believe it's higher.

13 Q Do you have a sense of how much higher?

14 A Guessing, probably about ten or twelve
15 students.

16 Q Did GNETS of Oconee students appear in school
17 yearbooks?

18 A They do. I'm not really sure. I've seen some
19 yearbooks that have them in but I'm not sure if they
20 are in all of them or not.

21 Q Does your GNETS program use restraints on
22 students?

23 A For emergencies where students are dangerous
24 to themselves or dangerous to others, yes.

25 Q Is physical restraint ever used to move

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1 students who are escorted to an isolated space?

2 A If students are dangerous to themselves or
3 others and are in need of being in a safer location,
4 they will be transported or escorted physically, yes.

5 Q Have any GNETS of Oconee students been
6 physically harmed by the use of restraint or physical
7 intervention by staff in the last two years?

8 A Not that I am aware of.

9 Q What about in the last five years?

10 A Not that I'm aware of.

11 Q Are you aware of any students who have sought
12 medical care following an incident of physical
13 restraint or physical interaction with staff in the
14 past two years?

15 A No.

16 Q What about in the past five years?

17 A No.

18 Q Does GNETS of Oconee video record the interior
19 spaces of any of its sites?

20 A In terms of is there a set camera that is
21 located on site? Some of the school systems have
22 cameras in the classroom and in the halls, yes.

23 Q Are those video recordings reviewed upon
24 reporting of incidents of physical intervention or
25 restraint?

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1 A Occasionally, yes.

2 Q Under what circumstances would they be
3 reviewed?

4 A If there was a concern, if there was any
5 concern in a procedural violation or if there was an
6 injury or anything like that. Not all of the
7 restraints reported are viewed, but if there were
8 concerns, we would definitely try to seek viewing it.

9 Q Does GNETS of Oconee document the use of
10 restraint?

11 A Yes.

12 Q How is that done?

13 A Through an incident report and through an
14 educator's handbook referral.

15 Q Is there a specific time frame for completing
16 that documentation?

17 A 24 hours.

18 Q Who is responsible for completing that
19 documentation?

20 A The person doing the restraining.

21 Q Does anyone review the documentation?

22 A I do.

23 Q How often do you review documentation?

24 A They review, if a restraint report is sent to
25 me, I review it immediately.

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1 Q What is the purpose of your reviewing the
2 restraint report?

3 A To ensure that all less restrictive
4 interventions were applied.

5 Q Have you reviewed reports where you found that
6 that has not been the case?

7 A Recently this year there was a situation with
8 a Benchmark staff person who restrained one of our
9 students. And I felt that the documentation and
10 interviewing her and interviewing the other staff
11 members that witnessed the restraint, I felt like it
12 was not a less restrictive approach. I felt like it
13 was a power struggle and I immediately called her and
14 talked to her about that.

15 Q Was there any other action taken apart from
16 the conversation with the Benchmark personnel?

17 A No.

18 Q Does GNETS of Oconee use seclusion?

19 A No.

20 Q Does GNETS of Oconee have rooms that are used
21 for intensive intervention?

22 A No.

23 MS. GARDNER: Let's mark this as Plaintiff's
24 Exhibit 508.

25 (Plaintiff's Exhibit 508 was marked for

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1 identification.)

2 (Witness reviewing document.)

3 BY MS. GARDNER:

4 Q You have been handed what's been marked as
5 Plaintiff's Exhibit 508. This is an email from you to
6 Nakeba Rahming dated January 19, 2017. The subject is
7 "Dashboard iReady," and this email is Bates stamped
8 GA000130985.

9 Do you recognize this email?

10 A Yes.

11 Q You write to Ms. Rahming, "The GNETS dashboard
12 was the other thing I meant to ask you about and we
13 didn't have that on our agenda. It would be helpful if
14 directors got some sort of direction in writing on how
15 to use their dashboard."

16 Do you see that?

17 A Yes.

18 Q What is the dashboard that they are referring
19 to?

20 A Again, this is from 2017 so it's been a good
21 while ago, but the dashboard was to be a State GNETS
22 dashboard that we would be able to use and see GNETS
23 information. It never really came up and running that
24 I know of.

25 Q Do parents of GNETS of Oconee students have to

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1 sign a records release for their students to receive
2 GNETS services?

3 A Yes.

4 Q What is the purpose of that records release?

5 A It's not to receive records like school
6 records, but we require with our intake paperwork an
7 information release to like mental health providers,
8 Department of Family and Children's Services providers
9 for continuity of services.

10 MS. GARDNER: I'd like to have that marked as
11 Plaintiff's Exhibit 509.

12 (Plaintiff's Exhibit 509 was marked for
13 identification.)

14 (Witness reviewing document.)

15 BY MS. GARDNER:

16 Q You have been handed what's marked as
17 Plaintiff's Exhibit 509. This is an email from you to
18 Nakeba Rahming dated March 7, 2016. The Bates stamp on
19 this document is GA00040936.

20 Looking at the bottom of this page, am I
21 correct that you received an email from Alan Judd on
22 March 30, 2016 in which he says, "I am following up on
23 my Open Records Act request of February 23, 2016
24 seeking information on restraints at Horizon Academy.
25 Can you please let me know when you will be able to

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1 provide the requested material?"

2 Did you have any understanding why Mr. Judd
3 was reaching out to you regarding an Open Records
4 request regarding Horizon Academy?

5 MR. NGUYEN: Object to the form.

6 You may answer the question.

7 A No, I don't remember the email.

8 BY MS. GARDNER:

9 Q You forward that email to Ms. Rahming and say,
10 "Would you please forward to the attorney?" Is that
11 correct?

12 A Correct.

13 Q What attorney were you referring to?

14 A I'm assuming the State attorneys, the
15 Department of Education attorneys.

16 Q Were you present for a site visit to GNETS of
17 Oconee in May 2022 in which experts for the United
18 States toured the facility and observed classrooms?

19 A Yes.

20 Q How long before the site visits did you learn
21 that those visits would occur?

22 A It was very quick, I want to say within a
23 week, two weeks I knew that they were going to come and
24 visit.

25 Q Did you do anything to prepare for the visits?

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1 A Cleaned up our classrooms, made them
2 presentable. I mean, they were presentable, but made
3 them more presentable; did walk-throughs ourselves,
4 walked through with the system personnel and took a
5 look at the classrooms.

6 Q What were you looking at the classrooms for?

7 A Ensuring that they were safe and suitable for
8 our students.

9 Q How long before the United States site visit
10 did you do those walk-throughs?

11 A A week before maybe. I can't remember exactly
12 how many days.

13 Q Did you have any conversations with anyone on
14 your staff about the visits in advance of their
15 occurrence?

16 A Yes, I told my staff that they will have
17 visitors coming into the room and that, not to worry
18 about, you know, be concerned about anything, that they
19 wouldn't be asked any questions and to just do what
20 they normally do.

21 Q Were there any modifications made to any class
22 schedules or student schedules in advance of the visit?

23 A No.

24 Q Did you or anyone on your staff have any
25 conversations with students or their families about the

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1 visits in advance of their occurrence?

2 A No.

3 Q Were any students invited to stay home on the
4 date that the United States site visits occurred?

5 A No.

6 Q Were any students requested to stay home on
7 the date the United States site visits occurred?

8 A Not that I know of.

9 Q Did you or anyone on your staff have any
10 conversations with anyone representing the State about
11 site visits before they occurred?

12 A Can you repeat the question?

13 Q Can you or anyone on your staff have any
14 conversations with anyone representing the State about
15 site visits before they occurred?

16 A Not that I know of.

17 Q Did you or anyone on your staff have any
18 conversations with anyone from the Georgia Department
19 of Education about the site visits before they
20 occurred?

21 A No.

22 Q Did you have any such conversations after the
23 site visits were complete?

24 A No.

25 Q In what ways do you think access to

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1 therapeutic services for students served in GNETS could
2 be improved?

3 MR. NGUYEN: Object to the form.

4 You may answer the question.

5 THE WITNESS: I'm thinking.

6 MR. NGUYEN: Okay.

7 A Again, I do feel strongly that our students in
8 this model, in our satellite model for GNETS of Oconee
9 are not being served in the way that really will help
10 them with their intense therapeutic needs, the trauma
11 that they have gone through. So I don't feel that
12 serving them under this model is the best thing for
13 them.

14 BY MS. GARDNER:

15 Q What change would you recommend in light of
16 that, if any?

17 A I feel like a best case scenario for our GNETS
18 program is to go back to a center-based model that can
19 support each of those students and have all the
20 supports that they need on site in place for them each
21 and every day.

22 Q Have GNETS of Oconee students gone on any
23 field trips this school year or last?

24 A Yes.

25 Q How many?

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1 A There has been two that I know of.

2 Q Were those for a particular GNETS of Oconee
3 site?

4 A Yes, the Wilkinson County this year attended
5 the Literacy Walk which the whole, all the school
6 systems participate in. So our students got to
7 participate with those students.

8 Last year, it was either last year or the year
9 before that, our students were able to go to the
10 Aquarium in Atlanta with Putnam County. That's all I
11 can think of off the top of my head. But I know that
12 they have gone on different field trips.

13 MS. GARDNER: Can we just take a quick
14 two-minute break?

15 MR. NGUYEN: Sure.

16 THE VIDEOGRAPHER: We are off the record at
17 5:51 p.m.

18 (Recess.)

19 THE VIDEOGRAPHER: We are back on the record
20 at 5:58.

21 MS. GARDNER: I have just a couple of cleanup
22 questions.

23 BY MS. GARDNER:

24 Q I wanted to ask you a funding question. Is
25 the amount of money GNETS of Oconee has allocated for a

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1 given staff position for an upcoming year tied in any
2 way to how much you are spending on that staff position
3 in the current year?

4 A Can you repeat that question?

5 Q I am trying to understand, for example, if you
6 had a counselor who this year you are paying \$65,000 a
7 year, are you in any way limited from spending more
8 than that next year on that position because that is
9 the amount that's being spent in the present year?

10 A So the State teachers salary pay scale is
11 going to have SEP increases that will impact our
12 budgets in terms of those kind of things. I don't know
13 if that answers your question. But yes, it will impact
14 in terms of it's going to be a higher amount needed to
15 support paying for that position and however many other
16 SEP increases there are.

17 Q So to your knowledge, though, is there any
18 sort of ceiling that you come up against in future
19 years because of the amount that you decided to spend
20 on a particular position in a current school year?

21 A None that I'm aware of.

22 Q Who is Robena LaPointe?

23 A Robena LaPointe, she's the professional
24 counselor, the LPC, she is working towards our LPC, she
25 hasn't gotten her degree yet. She has a master's in

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1 psychology but hasn't gotten her certification yet as a
2 professional counselor. She still has to take the
3 exam.

4 Q She is the counselor whom you have been
5 referring to during this deposition as eligible for
6 licensure?

7 A Yes.

8 Q How long has she been on staff at GNETS of
9 Oconee?

10 A She has been with us, I think she's in her
11 fourth or fifth year.

12 Q Was she eligible for licensure when she joined
13 GNETS of Oconee?

14 A She was.

15 Q You mentioned earlier that GNETS of Oconee
16 collaborates with some private providers. Do you
17 recall that?

18 A Yes.

19 Q Do those private providers typically have
20 preexisting relationships with GNETS of Oconee students
21 or does GNETS of Oconee facilitate students' connection
22 to those private providers?

23 A We facilitate connection to those providers.

24 Q How many students approximately last year did
25 GNETS of Oconee connect to private providers?

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1 A It's not only just private, it's public
2 providers like River Edge Behavioral Health, Oconee
3 Center, Pure Heart Behavioral, Benchmark, so some of
4 them are already in those services. And then some are
5 referred for services. So off the top of my head, you
6 are asking how many I referred or we would have
7 referred?

8 Q Yes, for the private providers last school
9 year, how many students, approximation?

10 A Approximately maybe ten.

11 MS. GARDNER: I don't think I have any other
12 questions for you. Thank you so much for your time
13 today.

14 THE WITNESS: Thank you.

15 MR. NGUYEN: Danielle, are you ready?

16 MS. HERNANDEZ: I am, yes, thank you.

17 EXAMINATION

18 BY MS. HERNANDEZ:

19 Q Hi, Ms. Wolf. Thank you so much for being
20 here today. My name is Danielle Hernandez. I
21 represent the State of Georgia. We cross-noticed this
22 deposition, so I have a few questions for you.

23 I know you spoke earlier about IEP teams and
24 who makes up an IEP team. Is there anyone from the

25 State who is a member of an IEP team for a student at

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1 Oconee GNETS?

2 A No.

3 Q Now I just want to talk about evaluations. As
4 your role of director of GNETS of Oconee, do you ever
5 receive any kind of evaluation, and if so, by who?

6 A I do, I receive an evaluation by my supervisor
7 at Oconee RESA, the executive director, and they do the
8 leadership keys evaluation.

9 Q What does that evaluation entail?

10 A So there are ten standards that leaders are
11 evaluated on, fiscal performance, collaboration,
12 professional learning, staff supervision,
13 organizational operation, things like that. I can't
14 name all the standards but there are several different
15 standards that we're evaluated on through that process.

16 Q Thank you. Does your staff receive any
17 evaluations?

18 A Yes, they do. The teachers receive the
19 teacher keys evaluations, observations throughout the
20 year, formative assessments, summative assessments,
21 conferencing, those kind of things. The
22 paraprofessionals also receive evaluation.

23 Q Who performs those evaluations of your staff?

24 A So I perform evaluations, the summative
25 performances on all of my staff, but Ms. Brundage, our

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1 treatment coordinator, will assist in operations and
2 giving feedback. But I'm the one that's responsible
3 for the evaluations.

4 Q Who is in charge of the hiring and firing
5 decisions of the staff and personnel at Oconee GNETS?

6 A Primarily, in terms -- I will make
7 recommendations to the Oconee RESA on personnel that I
8 recommend for hire. And typically, they will hire
9 based on my recommendation. If there's an issue of
10 termination, that also goes before the RESA Board of
11 Control.

12 Q You had mentioned earlier, I just want to
13 clarify, are all staff members of Oconee GNETS, are
14 they all paid through the State grant or are they
15 funded, is their payroll funded through another
16 mechanism?

17 A There are a few staff members that are paid
18 under the Federal allocations, the 6B funds.

19 (Discussion off the record.)

20 MR. NGUYEN: Danielle, can you speak up a
21 little bit? You were kind of breaking up. It was
22 kind of a bad connection at the moment.

23 MS. HERNANDEZ: Yes.

24 BY MS. HERNANDEZ:

25 Q I was asking, does the GNETS program receive

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1 in-kind services from the LEAs?

2 A We do receive in-kind services in terms of
3 transportation, licenses for intervention programs,
4 reading and math interventions, those kind of things.

5 Q My last question for you: Who does the Oconee
6 GNETS program reach out to when they have, for example,
7 maintenance requests and tech requests?

8 A The local school system.

9 MS. HERNANDEZ: Perfect. Those are all my
10 questions. Thank you so much.

11 THE WITNESS: Thank you.

12 MR. NGUYEN: Followup?

13 MS. GARDNER: No.

14 THE VIDEOGRAPHER: Nothing else for the
15 record? That concludes the deposition of Patricia
16 Wolf. We are off the record at 6:07 p.m.

17 (Off the video record:)

18 THE COURT REPORTER: Ms. Hernandez, do you
19 require a copy of the transcript?

20 MS. HERNANDEZ: Yes, please, electronic and
21 mini.

22 (Deposition concluded at 6:07 p.m.)
23
24
25

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D I S C L O S U R E

I, Maxyne Bursky, CCR, do hereby disclose pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that I am a Georgia CCR here as a representative of Appalachian Court Reporting (ACR), who was requested to take this deposition by Esquire Deposition Solutions (EDS), who was contacted by the party taking the deposition to provide court reporting services for this deposition; neither I, nor ACR, nor EDS will be taking this deposition under any contract prohibited by O.C.G.A. Section 15-14-37(a) and (b), and are not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c).

Neither I, nor ACR, nor EDS have any contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. The firm will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.

Firm Representative

Date

Appalachian Court Reporting

10/11/22
Date

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CERTIFICATE OF COURT REPORTER

STATE OF GEORGIA)

COUNTY OF HENRY)

I hereby certify that the foregoing deposition was reported as stated in the caption, by the method of stenography, and the questions and answers thereto were reduced to typewriting by me; that the foregoing pages represent a true, correct, and complete transcript of the evidence given on October 6, 2022, by the witness, PATRICIA JOANN WOLF, who was first duly sworn by me.

This the 11th day of October, 2022.

Maxyne Bursky

Maxyne Bursky CCR
Certified Court Reporter
Certificate # 2547

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1 Caption: UNITED STATES OF AMERICA V. STATE OF GEORGIA
2 Deposition of: PATRICIA JOANN WOLF
3 Date: OCTOBER 6, 2022

4 I, the undersigned, do hereby certify that I
5 have read the foregoing transcript of my deposition and
6 that:

7 _____ There are no changes noted.

8 _____ The following changes are noted:

9 Page: Line: Reads as: Should read:

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20 _____
PATRICIA JOANN WOLF

21 _____
Date

22 SUBSCRIBED AND SWORN To before me
23 this _____ day of _____, 2022.

24 _____
25 NOTARY PUBLIC

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